



**AmeriCorps**

**Office of Monitoring  
Common Monitoring Findings by Monitoring  
Activity**

Office of Monitoring  
September 2024

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## Change Log

Change Number	Section	Question Number	Description	Date Changed	Comments
1	AmeriCorps State and National	03.03.02	Changed protected class language to "Sex"; NOTE updated to include "From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions."	01.20.25	In compliance with Executive Order: "Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government"
2	AmeriCorps VISTA	05.03.02	Changed protected class language to "Sex"; NOTE updated to include "From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions."	01.20.25	In compliance with Executive Order: "Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government"
3	AmeriCorps Seniors - Foster Grandparent Program	07.03.02	Changed protected class language to "Sex"; NOTE updated to include "From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions."	01.20.25	In compliance with Executive Order: "Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government"

Change Number	Section	Question Number	Description	Date Changed	Comments
4	New To AmeriCorps	11.02.02	Changed protected class language to "Sex"; NOTE updated to include "From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions."	01.20.25	In compliance with Executive Order: "Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government"

## Introduction

This report is a review of the data collected through the work that the Office of Monitoring (OM) has conducted from 2020 to date. During each annual monitoring cycle, monitoring officers and associate monitoring officers complete monitoring activities based upon submitted paperwork, organization policies, interviews, and/or site visits. OM provides monitoring activity results and constructive and specific guidance as to whether they are in compliance with statute, regulations, and the terms and conditions of their award, and, if not, works with the grantee to develop a corrective action plan for the grantee to re-align with the requirements. This process provides grantees with a roadmap that leads to greater financial stability, better program outcomes, and stronger compliance with the regulations they committed to adhere to by accepting a federal award and its terms and conditions. Monitoring officers utilize the Uniform Monitoring Package (UMP) to conduct all monitoring activities. The UMP can be found on the [monitoring](#) site and provides the full list of standardized questions used during monitoring. This UMP resource is updated annually and shared publicly.

The tables in this report display the questions from the UMP with the highest number of non-compliant findings. The rankings list the top five non-compliant questions for each monitoring activity type. First, the results are shown for all monitored grantees in AmeriCorps, then they are divided into three subsets of our largest programs: AmeriCorps Seniors, AmeriCorps State and National, and AmeriCorps VISTA, where applicable.

Rankings are based on the number of recorded answers of non-compliance for the specified question listed in descending order from highest to lowest. While “Noncompliance Finding Rate” is provided, it is not used in the rankings. Thus, number one will be the question with the highest number of recorded non-compliance over the last four years of monitoring activities.

Accompanying numerical data, the text of the most recent iteration of the top five questions is provided from the UMP. Each section also includes linked references to the regulation that the question is based upon. Additionally, “Compliance Tips” for each finding are provided, offering general guidance on how to avoid non-compliance on the monitored question.

# Financial and Operational Fitness Assessment (FOFA)

## Top Five Findings

Overall	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category (see Compliance Tips for details)
	1	89	126	70.63%	01.10.02	Procurement
	2	68	128	53.13%	01.06.01	Cost Testing
	3	53	133	39.85%	01.08.01	Record Retention
	4	52	128	40.63%	01.01.01	Reporting
	5	49	102	48.04%	01.02.02	Match/Recipient Share
AmeriCorps State and National	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	18	29	62.07%	01.10.02	Procurement
	2	11	27	40.74%	01.02.02	Match/Recipient Share
	3	11	31	35.48%	01.06.01	Cost Testing
	4	10	33	30.30%	01.08.01	Record Retention
	5	7	23	30.43%	01.02.01	Match/Recipient Share
AmeriCorps Seniors	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	55	75	73.33%	01.10.02	Procurement
	2	50	76	65.79%	01.06.01	Cost Testing
	3	36	78	46.15%	01.07.02	Internal Controls
	4	35	65	53.85%	01.05.02	Cash Management
	5	35	77	45.45%	01.01.01	Reporting
VISTA	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	15	21	71.43%	01.10.02	Procurement
	2	11	20	55.00%	01.01.01	Reporting
	3	10	13	76.92%	01.02.03	Match/Recipient Share
	4	9	18	50.00%	01.02.01	Match/Recipient Share
	5	8	21	38.10%	01.03.01	Direct Cost Allocation Methodology

## Compliance Tips

**Question Ranking:** #1 Overall, #1 AmeriCorps State and National, #1 AmeriCorps Seniors, #1 VISTA

**UMP Section & Question:** Section 01.10: Procurement - 01.10.02

**Question Text:** If [a recipient has a procurement] policy, does it include the following minimum elements?

- Standards of conduct that cover at minimum conflicts of interest and disciplinary actions to be applied for violations of such standards (select "yes" if this is a state entity)
- Delineation of purchase thresholds (select "yes" if this is a state entity)

## Financial and Operational Fitness Assessment (FOFA) – continued

- Single source provisions (select "yes" if this is a state entity), and necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

### **Reference:** [2 CFR 200.317-327](#)

Uniform Guidance's Post Federal Award Requirements (subpart D) codify a series of Procurement Standards (2 CFR 200.317 - 327).

- 2 CFR 200.318 requires that recipients must have and use documented procurement procedures for the acquisition of property or services under a federal award or subaward and that those standards must conform with 200.317 through 200.327. This includes maintaining written standards of conduct covering conflicts of interest that provide for disciplinary actions to be applied for violations of such standards (200.318(c)(1)).
- 2 CFR 200.319 requires that all procurement transactions for the acquisition of property or services required under a federal award must be conducted in a manner providing full and open competition. The procurement methods defined in 200.320 help define full and open competition.
- 2 CFR 200.320 outlines specific procurement methods that must be followed based upon the dollar value of property or service acquired. These methods include -
  - Informal procurement methods (200.320(a)) -
    - Recipients should distribute micro-purchases equitably among qualified suppliers. The micro-purchase threshold is \$10,000 unless a recipient qualifies and chooses to self-certify a threshold as outlined in 200.320(a)(1)(iv).
    - Recipients must obtain price or rate quotations from an adequate number of qualified sources as they determine appropriate for purchases above the micro-purchase threshold but below the simplified acquisition threshold. The simplified acquisition threshold is \$250,000.
  - Formal procurement methods (200.320(b)) -
    - Recipients must follow formal procurement procedures for all procurements above the simplified acquisition threshold. This includes publicly advertising procurements and soliciting sealed bids or proposals from interested vendors.
  - Noncompetitive procurement -
    - Uniform guidance outlines specific circumstances when noncompetitive procurement can be used (200.320(c)).
- 2 CFR 200.321 requires that recipients must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Uniform guidance defines what affirmative action steps must be taken (200.321(b)).

## Financial and Operational Fitness Assessment (FOFA) - continued

**TIP:** Uniform Guidance's Subpart A explicitly defines the terms used throughout its text (e.g., non-federal entity, property, service, micro-purchase threshold, simplified acquisition threshold, etc.). Refer to the definitions to ensure grantee policies address all required elements.

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**Question Ranking:** #2 Overall, #3 AmeriCorps State and National, #2 AmeriCorps Seniors

**UMP Section & Question:** Section 01.06: Cost Testing - 01.06.01

**Question Text:** Are the sampled costs free of issues/errors?

**Reference:** [2 CFR 200.303](#), [2 CFR 200.420 - 476](#) General Provisions for Selected Items of Cost

Uniform guidance requires that recipients maintain written procedures for determining the allowability of costs in accordance with its outlined Cost Principles (subpart E) and the terms and conditions of the federal award (2 CFR 200.302(b)(7)).

- Subpart E's Basic Considerations (200.402 - .411) outline general provisions around the allowability of costs. Per those provisions, costs must be -
  - Allowable (200.403): Expenses must meet the eight criteria outlined to be allowable under federal awards. Among these criteria, costs must -
    - Be necessary and reasonable for the performance of the federal award and be allocable (200.403(a)).
    - Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost (200.430(d)).
    - Be adequately documented (200.403(g)).
    - Incurred during the approved budget period (200.403(h)).
  - Reasonable (200.404): A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision made to incur the cost.
  - Allocable (200.405): A cost is allocable to a particular federal award if the goods or services involved are chargeable or assignable to that federal award in accordance with the relative benefits received (200.405(a)).
- The General Provisions for Selected Items of Cost (200.420 - .476) section outlines specific considerations around select costs. These considerations include whether classes of expenses are explicitly unallowable (e.g., alcohol) or require prior approval (e.g., equipment).
- Uniform guidance requires that payments made for costs determined to be unallowable by either the federal awarding agency, cognizant agency for indirect costs, or pass-through entity, either as direct or indirect costs, must be refunded (including interest) to the federal government (200.410).



## Financial and Operational Fitness Assessment (FOFA) - continued

**TIP:** It is critical that recipients maintain documentation that would enable a reasonable third party to determine whether costs are allowable, allocable and reasonable. Monitoring officers will disallow expenses when they are unable to make this determination based on the available documentation. Note that these rules apply to direct and indirect, as well as federal and match expenses.

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**Question Ranking:** #3 Overall, #4 AmeriCorps

**UMP Section & Question:** Section 01.08: Record Retention - 01.08.01

**Question Text:** Does the sponsor/grantee have a written policy for retention of financial records and supporting documentation for three years from the date of the submission of the final FFR, or when any final action is taken to resolve any claim, audit, or investigation involving the grant?

**Reference:** [2 CFR 200.334](#)

Uniform guidance requires that Financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to a federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the federal awarding agency or pass-through entity in the case of a subrecipient (2 CFR 200.334).

**TIP:** Section 200.334 includes a number of exceptions to the record retention requirement outlined above. Recipients should take specific note of, and include in their policy, the initial exception, which requires that if any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

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**Question Ranking:** #4 Overall, #5 AmeriCorps Seniors, #2 VISTA

**UMP Section & Question:** Section 01.01: Reporting - 01.01.01

**Question Text:** Do the recipient's financial records support the federal expenditures reported in the sampled Federal Financial Report (FFR)?

**Reference:** [2 CFR 200.328](#), [2 CFR 200.302](#)

Uniform Guidance's Post Federal Award Requirements (subpart D) indicate that the financial management system of each recipient must provide for the following:

- Accurate, current, and complete disclosure of the financial results of each federal award or program in accordance with the reporting requirements set forth (200.302(b)(2)).
- Records that identify adequately the source and application of funds for federally funded activities (200.302(b)(3)).

## Financial and Operational Fitness Assessment (FOFA) - continued

**TIP:** Recipients must maintain and retain adequate documentation for each expense that is charged to a federal award. That documentation should enable a reasonable third party (e.g., monitoring officers) to understand what occurred without the need for substantive follow up. This includes tracing the financial figures reported in Federal Financial Reports down to individual transactions in a recipient's financial system. Also, when providing the requested general ledger, rambler to ensure the general ledger time period matches the time period of the FFR that the monitoring officer is reviewing.

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**Question Ranking:** #5 Overall, #2 AmeriCorps

**UMP Section & Question:** Section 01.02: Match/Recipient Share - 01.02.02

**Question Text:** If [a recipient has a match] policy, does it include the following minimum elements?

- address how match is tracked and reported?
- specify that if Match comes from a federal source that the requirements of both grants are met and that the match source and amount are reported on Federal Financial Report?
- shows how in-kind donations are valued and recorded at fair market value?

**Reference:** [2 CFR 200.306](#)

Uniform Guidance's Post Federal Award Requirements (subpart D) indicate that the financial management system of each recipient must provide for the following:

- Records that identify adequately the source and application of funds for federally funded activities (200.302(b)(3)). This includes records that clearly identify match revenue and expenses.

Recipients must also ensure that their written procedures for determining the allowability of costs (2 CFR 200.302(b)(7)) cover the match specific requirements outlined in 2 CFR 200.306. Those requirements include -

- specifying that if match comes from a federal source that the requirements of both grants are met and that the match source and amount are reported on Federal Financial Report (2205.306).
- ensuring that in-kind donations are valued and recorded at fair market value (200.306(j)).

**TIP:** Note that prior approval is not required when using funds from another federal agency as match. However, obtaining and documenting prior approval is one of the best ways that a recipient can demonstrate that those match funds are allowable.

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**Question Ranking:** #5 AmeriCorps State and National, #4 VISTA

**UMP Section & Question:** Section 01.02: Match/Recipient Share - 01.02.01

**Question Text:** Does the sponsor/grantee have a written policy that addresses how it treats match?

## Financial and Operational Fitness Assessment (FOFA) - continued

**Reference:** [2 CFR 200.306](#)

Uniform guidance requires that recipients maintain written procedures for determining the allowability of costs in accordance with its outlined cost principles (subpart E) and the terms and conditions of the federal award (2 CFR 200.302(b)(7)).

This includes maintain procedures that explicitly define how the recipient addresses match and ensures that those expenses are aligned with the match specific requirements outlined in 2 CFR 200.306.

**TIP:** Note that the allowable, allocable, reasonable, and adequately documented standards codified in Uniform Guidance's Cost Principles (subpart E) apply to both federal as well as match expenses. Finally, note that a match procedure is only required when the recipient's budget includes match.

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**Question Ranking:** #3 AmeriCorps Seniors

**UMP Section & Question:** Section 01.07: Internal Controls - 01.07.02

**Question Text:** Do the sponsor's/grantee's written financial polices explicitly state the internal controls in place, consistent with the worksheet's results, required staff interviews and cost testing observations?

**Reference:** [2 CFR 200.303](#)

Uniform guidance (2 CFR 200.303(a)) requires recipients to establish and maintain effective internal control over the federal award that provides reasonable assurance that the non-federal entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**TIP:** The adequate segregation of duties is a critical internal control. This entails ensuring that no one person is placed in a position where it is possible to both commit and conceal fraud, waste, and abuse. It is highly recommended that recipients develop written procedures that codify the separation of key financial duties.

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**Question Ranking:** #4 AmeriCorps Seniors

**UMP Section & Question:** Section 01.05: Cash Management - 01.05.02

## Financial and Operational Fitness Assessment (FOFA) – continued

**Question Text:** If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements?

- Cash is drawn on a reimbursement or ‘as-needed’ basis, and not held in excess of three (3) working days;
- Procedural steps that outline the approval and drawdown process, including who is responsible for each action.

**Reference:** [2 CFR 200.305](#), PMS Payment Certification

**TIP:** Uniform guidance requires that recipients maintain written procedures to implement the requirements of 200.305 (federal payment). This includes identifying the internal duties involved in processing drawdowns and the segregation of those duties. Further, the Payment Management System began requiring recipients to certify that they will not hold federal cash in excess of three (3) working days prior to processing each drawdown request on April 1, 2023. This requirement reinforces uniform guidance’s mandate that recipients minimize the time elapsing between the transfer of funds and the disbursement by the recipient (2 CFR 200.305(b)).

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**Question Ranking:** #3 VISTA

**UMP Section & Question:** Section 01.02: Match/Recipient Share - 01.02.03

**Question Text:** Do the recipient’s financial records support the match expenditures reported in the sampled Federal Financial Report (FFR)?

**Reference:** [2 CFR 200.306](#)

Uniform Guidance’s Post Federal Award Requirements (subpart D) indicate that the financial management system of each recipient must provide for the following:

- Accurate, current, and complete disclosure of the financial results of each federal award or program in accordance with the reporting requirements set forth (200.302(b)(2)).
- Records that identify adequately the source and application of funds for federally funded activities (200.302(b)(3)).

**TIP:** Recipients must maintain and retain adequate documentation for each expense that is charged to a federal award. That documentation should enable a reasonable third party (e.g., monitoring officers) to understand what occurred without the need for substantive follow up. This includes tracing the financial figures reported in Federal Financial Reports down to individual transactions in a recipient’s financial system.

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**Question Ranking:** #5 VISTA

**UMP Section & Question:** Section 01.03: Direct Cost Allocation Methodology - 01.03.01

**Question Text:** Does the sponsor/grantee have a written methodology that adequately describes how direct costs are allocated on a reasonable basis?

## *Financial and Operational Fitness Assessment (FOFA) - continued*

**Reference:** [2 CFR 200.405](#), [2 CFR 200.413](#)

Uniform guidance requires that recipients maintain written procedures for determining the allowability of costs in accordance with its outlined cost principles (subpart E) and the terms and conditions of the federal award (2 CFR 200.302(b)(7)).

- Subpart E's Basic Considerations (200.402 - .411) outline general provisions around the allowability of costs. Per those provisions, costs must be -
  - Reasonable (200.404): A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision made to incur the cost.
  - Allocable (200.405): A cost is allocable to a particular federal award if the goods or services involved are chargeable or assignable to that federal award in accordance with the relative benefits received (200.405(a)).

**TIP:** Recipients should carefully consider what drives each expense when developing allocation methods. Using these cost drivers as their allocation bases will help recipients ensure that federal awards are only charged their fair share of these expenses. For example, the square footage used by a federal award is often used as the basis for allocating facilities expenses.

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# Programmatic Review: AmeriCorps State and National

## Top Five Findings

AmeriCorps State and National	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	9	23	39.13%	03.01.08	ASN Member Management
	2	7	9	77.78%	03.03.03	Verification of Terms and Conditions
	3	7	18	38.89%	03.03.02	Verification of Terms and Conditions
	4	6	18	33.33%	03.02.01	ASN Program Financial Review
	5	5	18	27.78%	03.03.01	Verification of Terms and Conditions

## Compliance Tips

**Question Ranking:** #1 AmeriCorps State and National

**UMP Section & Question:** Section 03.01: ASN Member Management - ASN Programmatic - 03.01.08

**Question Text:** Does the grantee recognize AmeriCorps support?

- Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?
- Are members provided information that projects are part of AmeriCorps?
- Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?
- If applicable, do agreements with subsites explicitly state the program is an AmeriCorps program?

**Reference:** [General Terms and Conditions](#)

**TIP:** Section H of the AmeriCorps General Terms and Conditions (linked above) is concerned with recognition of AmeriCorps support and reads (in part) as follows: *Recipients shall identify their programs, projects, or initiatives, and their members or volunteers, through the use of visual representations, including: logos, insignias, written acknowledgements, publications and other written materials; websites and social media platforms; and service gear such as clothing. All visual representations must follow current AmeriCorps branding guidelines, which include proper logo use and cobranding requirements. To provide recipients technical assistance in ensuring compliance with proper logo use and cobranding requirements, AmeriCorps provides brand guidelines, to which recipients and subrecipients should refer and follow.*

When the monitoring officer is reviewing public documentation for compliance, they are ensuring that AmeriCorps support is both identifiable and current. The most common reason for a noncompliant finding here is that grantees are not following current [brand guidelines](#) (the link includes downloadable logos for your use). Old/outdated logos are not sufficient for compliance, so be sure to review all public facing documentation applicable to AmeriCorps support.

*Programmatic Review: AmeriCorps State and National - continued*

**Question Ranking:** #2 AmeriCorps State and National

**UMP Section & Question:** Section 03.03: Verification of Terms and Conditions - 03.03.03

**Question Text:** Based on information available to AmeriCorps, in the last two years, did the grantee document grievances and/or discrimination/harassment complaints and the corresponding follow up/response in compliance with applicable federal statutes as embodied in the program regulations?

- Has the sponsor or any of the service sites/volunteer stations had grievances and/or discrimination/harassment complaints filed against them regarding services provided under this grant or had civil rights compliance reviews regarding services conducted? Yes/No
- Has the grantee or any service site had grievances and/or /discrimination/harassment complaints filed against them? Yes/No

**Reference:** [45 CFR 1225](#), [AmeriCorps Annual General Terms and Conditions](#), [45 CFR 2540](#)

**TIP:** Regulatory language specific to grievance policies and procedures is outlined in 45 CFR 1225 and 45 CFR 2540.230, while section M.3 of the AmeriCorps General Terms and Conditions is explicit about the requirement of grantees to “keep records and make available to AmeriCorps timely, complete, and accurate compliance information.”

If a grantee or its service sites/subrecipients have had grievances and/or discrimination/harassment complaints filed against them, then they are required to provide documentation substantiating the claim and any follow-up process initiated. The process must align with a compliant grievance policy.

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## Programmatic Review: AmeriCorps State and National - continued

**Question Ranking:** #3 AmeriCorps State and National

**UMP Section & Question:** Section 03.03: Verification of Terms and Conditions - 03.03.02

**Question Text:** Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?

\*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements (\* indicates updates from previous policy). From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions.

- Race
- Color
- National origin
- Sex
- Age
- Religion
- Sexual orientation
- Disability
- Political affiliation
- Marital or parental status
- Reprisal\*
- Genetic information
- Military service
- Pregnancy\*
- Submission of a complaint\*

**Reference:** [AmeriCorps Annual General Terms and Conditions](#)

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but very few grantees have a policy that explicitly lists all the federally required protected classes noted above. To be compliant with this monitoring question, the policy must explicitly list these classes. Variations on the language used above are strongly discouraged. Blanket language, such as “this policy does not allow discrimination against any federally protected classes,” is not comprehensive enough to be compliant. The full list of protected classes reviewed during the monitoring visit can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

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**Question Ranking:** #4 AmeriCorps State and National

**UMP Section & Question:** Section 03.02: ASN Program Financial Review - 03.02.01

**Question Text:** If the grant is a fixed price award, (Professional Corps, Full-time, or Education Award Programs) does the grantee have a policy to manage the calculation and drawdown of fixed price awards?

**Reference:** [Fixed Amount Grant Financial and Administrative Process Guide \(Edition 2.10, September 13, 2018\)](#)

**TIP:** This question is simply asking if such a policy exists. The relative frequency of noncompliance related to this question suggests that many grantees don't have a policy in place. The Fixed Amount Grant Financial and Administrative Process Guide can be accessed at the link above and should be used to develop the grantee's policy.



## *Programmatic Review: AmeriCorps State and National - continued*

It is important to note that this question will be followed by question 03.02.02, which confirms that your fixed price award policy contains elements aligned with the process guide. These elements are:

- Advances of fixed amount grant funds are not permitted outside of express written approval from AmeriCorps.
- How drawdowns are determined for the type of fixed amount award selected for monitoring:
  - For professional Corps and full-time awards: Earned funds are based on the actual hours served by enrolled members 26.
  - For Education Award Programs awards: Earned funds are based on the number of members enrolled, adjusted by slot type.

Even if there is a policy in place, it must incorporate the minimum elements noted above to be determined fully compliant. It is recommended that fixed price award grantees review their policy language on a regular basis.

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**Question Ranking:** #5 AmeriCorps State and National

**UMP Section & Question:** Section 03.03: Verification of Terms and Conditions - 03.03.01

**Question Text:** Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?

Documentation should outline the following at minimum:

- Time frames for filing and response;
- Person who receives and responds to the complaints both informal (grantee personnel) and formal (Director of the Equal Employment Opportunity Program or AmeriCorps designee);
- Documentation required;
- Legal representation is allowed;
- Freedom from retaliation/reprisal; and
- The process involved from initial filing, review, decisions made, corrective action, through close out.

**Reference:** [45 CFR 1225](#)

**TIP:** Regulatory language specific to grievance policies and procedures is outlined in 45 CFR 1225. The purpose of 45 CFR 1225 “is to establish a procedure for the filing, investigation, and administrative determination of allegations of discrimination based on race, color, national origin, religion, age, sex, disability or political affiliation, which arise in connection with the recruitment, selection, placement, service, or termination of AmeriCorps and AmeriCorps Seniors applicants, candidates, members, and volunteers for **part-time** and full-time service, as appropriate.”

## *Programmatic Review: AmeriCorps State and National - continued*

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The exclusion of language stating that legal representation is allowed *at any point in the grievance process* (45 CFR 1225.5);
- Documentation required (noted throughout 45 CFR 1225, should align with procedural language);
- Points of [contact](#) for formal and informal complaints. In this instance, formal refers to AmeriCorps staff and informal refers to grantee staff; and
- Grantee has a grievance policy in place for employees, but not AmeriCorps members.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its grievance policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225 is thorough and should be carefully considered when drafted or amending policy language for your organization.

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# Programmatic Review: AmeriCorps VISTA

## Top Five Findings

VISTA	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	35	40	87.50%	05.03.01	Verification of Terms and Conditions
	2	26	40	65.00%	05.03.05	Verification of Terms and Conditions
	3	23	40	57.50%	05.03.02	Verification of Terms and Conditions
	4	21	22	95.45%	05.03.06	Verification of Terms and Conditions
	5	21	40	52.50%	05.03.04	Verification of Terms and Conditions

## Compliance Tips

**Question Ranking:** #1 AmeriCorps VISTA

**UMP Section & Question:** Section 05.03: Verification of Terms and Conditions - 05.03.01

**Question Text:** Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?

Documentation should outline the following at minimum:

- Time frames for filing and response;
  - Person who receives and responds to the complaints both informal (grantee personnel) and formal (Director of the Equal Employment Opportunity Program or AmeriCorps designee);
  - Documentation required;
  - Legal representation is allowed;
  - Freedom from retaliation/reprisal; and
- The process involved from initial filing, review, decisions made, corrective action, through close out.

**Reference:** [45 CFR 1225](#)

**TIP:** Regulatory language specific to grievance policies and procedures is outlined in 45 CFR 1225. The purpose of 45 CFR 1225 "is to establish a procedure for the filing, investigation, and administrative determination of allegations of discrimination based on race, color, national origin, religion, age, sex, disability or political affiliation, which arise in connection with the recruitment, selection, placement, service, or termination of AmeriCorps and AmeriCorps Seniors applicants, candidates, members, and volunteers for part-time and full-time service, as appropriate."

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The exclusion of language stating that legal representation is allowed *at any point in the grievance process* (45 CFR 1225.5)

## Programmatic Review: AmeriCorps VISTA - continued

- Documentation required (noted throughout 45 CFR 1225, should align with procedural language).
- Points of [contact](#) for formal and informal complaints. In this instance, formal refers to AmeriCorps staff and informal refers to grantee staff.
- Grantee has a grievance policy in place for employees, but not AmeriCorps members.

**TIP:** While these are common areas of noncompliance, the grantee is strongly encouraged to review its grievance policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225 is thorough and should be carefully considered when drafted or amending policy language for your organization.

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**Question Ranking:** #2 AmeriCorps VISTA

**UMP Section & Question:** Section 05.03: Verification of Terms and Conditions - 05.03.05

**Question Text:** Does the sponsor/grantee have a system (a plan or process) in place for ensuring accessibility to persons with Limited English Proficiency?

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), Executive Order 13166, 67 FR 64604, Title VI, Civil Rights Act 1964: Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons

**TIP:** Language specific to this monitoring question can be found in Section M.2 of the AmeriCorps General Terms and Conditions and reads as follows: "Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons. Pursuant to Executive Order (EO) 13166 - Improving Access to Services for Persons with Limited English Proficiency, recipients are required to provide meaningful access to their programs and activities by LEP persons. For more information, please see the policy guidance at [67 FR 64604](#)."

When the monitoring officer is reviewing this question, they are looking specifically for a written policy. Organizations are often AmeriCorps VISTA ensuring accessibility, but they do not have written language codifying their process. Grantees are encouraged to review their policies and ensure alignment with 67 FR 64604.

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## Programmatic Review: AmeriCorps VISTA - continued

### **Question Ranking:** #3 AmeriCorps VISTA

**UMP Section & Question:** Section 05.03: Verification of Terms and Conditions - 05.03.02

**Question Text:** Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?

\*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements (\* indicates updates from previous policy). From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions.

- Race
- Color
- National origin
- Sex
- Age
- Religion
- Sexual orientation
- Disability
- Political affiliation
- Marital or parental status
- Reprisal\*
- Genetic information
- Military service
- Pregnancy\*
- Submission of a complaint\*

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), [AmeriCorps Grant Program Civil Rights and Non Harassment Policy](#), Non Discrimination: [45 CFR 2556.170](#), [45 CFR 2540.210](#)

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but very few grantees have a policy that explicitly lists all the federally required protected classes noted above. To be compliant with this monitoring question, the policy must explicitly list these classes. Variations on the language used above are strongly discouraged. Blanket language, such as “this policy does not allow discrimination against any federally protected classes,” is not comprehensive enough to be compliant. The full list of protected classes reviewed during the monitoring visit can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

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### **Question Ranking:** #4 AmeriCorps VISTA

**UMP Section & Question:** Section 05.03: Verification of Terms and Conditions - 05.03.06

**Question Text:** Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?

- a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?
- b. Does the policy include information on civil rights requirements and non-harassment, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?

## Programmatic Review: AmeriCorps VISTA - continued

- c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), [45 CFR 2556](#)

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but noncompliant policies are very common. In addition to ensuring that your policy contains the complete list of federally required protected classes, the policy must also be communicated compliantly and effectively. This monitoring question is closely aligned with questions 05.03.01 (related to grievance procedures) and 05.03.02 (related to protected classes), meaning that findings of noncompliance for these questions can directly impact this question as well.

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The policy does not note that an organization's compliance history with its nondiscrimination policy is available upon request. This can be a simple statement included in the policy language, but it must be explicitly stated.
- Notice of nondiscrimination compliance is not included on public facing documentation, including the grantee's website, promotional materials such as brochures and flyers, and job postings. Sample language specific to this requirement can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its nondiscrimination policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225, 45 CFR 2556 and the AmeriCorps General Terms and Conditions is thorough and should be carefully considered when drafted or amending policy language for your organization.

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**Question Ranking:** #5 AmeriCorps VISTA

**UMP Section & Question:** Section 05.03: Verification of Terms and Conditions - 05.03.04

**Question Text:** Does the grantee/sponsor have a policy and procedure in place regarding the provision of reasonable accommodation to ensure accessibility as per the federal requirements?

**Reference:** [45 CFR 1203/1214/1232](#), Rehabilitation Act of 1973: [Sections 504](#), [508](#)

*Programmatic Review: AmeriCorps VISTA - continued*

**TIP:** To determine compliance with this question, the monitoring officer will ensure that the grantee has a written reasonable accommodation policy in place. Programs and activities must be accessible to persons with disabilities, and the recipient must provide reasonable accommodation for the known mental or physical disabilities of otherwise qualified members, service recipients, applicants, and staff. All selections and project assignments must be made without regard to the need to provide reasonable accommodation.

Reasonable accommodation requirements are outlined at 45 CFR 1232.10. AmeriCorps does not provide a policy template or guidance as to how such a policy should be written, but the policy should adequately explain that the organization is equally accessible to any individual.

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# Programmatic Review: AmeriCorps Seniors – Senior Companion Program

## Top Five Findings

	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
AmeriCorps Seniors	1	9	9	100.00%	06.03.01	Verification of Terms and Conditions
	2	7	7	100.00%	06.03.06	Verification of Terms and Conditions
	3	7	11	63.64%	06.01.07	SCP Volunteer Management
	4	6	11	54.55%	06.01.04	SCP Volunteer Management
	5	5	10	50.00%	06.01.06	SCP Volunteer Management

## Compliance Tips

**Question Ranking:** #1 Senior Companion Program

**UMP Section & Question:** Section 06.03: Verification of Terms and Conditions - 06.03.01

**Question Text:** Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?

Documentation should outline the following at minimum:

- Time frames for filing and response;
- Person who receives and responds to the complaints both informal (grantee personnel) and formal (Director of the Equal Employment Opportunity Program or AmeriCorps designee);
- Documentation required;
- Legal representation is allowed;
- Freedom from retaliation/reprisal; and
- The process involved from initial filing, review, decisions made, corrective action, through close out.

**Reference:** [45 CFR 1225](#)

**TIP:** Regulatory language specific to grievance policies and procedures is outlined in 45 CFR 1225. The purpose of 45 CFR 1225 “is to establish a procedure for the filing, investigation, and administrative determination of allegations of discrimination based on race, color, national origin, religion, age, sex, disability or political affiliation, which arise in connection with the recruitment, selection, placement, service, or termination of AmeriCorps and AmeriCorps Seniors applicants, candidates, members, and volunteers for part-time and full-time service, as appropriate.”



## Programmatic Review: AmeriCorps Seniors – Senior Companion Program - continued

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The exclusion of language stating that legal representation is allowed *at any point in the grievance process* (45 CFR 1225.5)
- Documentation required (noted throughout 45 CFR 1225, should align with procedural language)
- Points of [contact](#) for formal and informal complaints. In this instance, formal refers to AmeriCorps staff and informal refers to grantee staff.
- Grantee has a grievance policy in place for employees, but not AmeriCorps members.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its grievance policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225 is thorough and should be carefully considered when drafting or amending policy language for your organization.

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### **Question Ranking:** #2 Senior Companion Program

**UMP Section & Question:** Section 06.03: Verification of Terms and Conditions - 06.03.06

**Question Text:** Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?

- a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?
- b. Does the policy include information on civil rights requirements and non-harassment, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?
- c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), [45 CFR 2551](#)

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but noncompliant policies are very common. In addition to ensuring that your policy contains the complete list of federally required protected classes, the policy must also be communicated compliantly and effectively. This monitoring question is closely aligned with questions 05.03.01 (related to grievance procedures) and 05.03.02 (related to protected classes), meaning that findings of noncompliance for those questions can directly impact this question as well.

## *Programmatic Review: AmeriCorps Seniors – Senior Companion Program - continued*

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The policy does not note that an organization’s compliance history with its nondiscrimination policy is available upon request. This can be a simple statement included in the policy language, but it must be explicitly stated.
- Notice of nondiscrimination compliance is not included on public facing documentation, including the grantee’s website, promotional materials such as brochures and flyers, and job postings. Sample language specific to this requirement can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its nondiscrimination policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225, 45 CFR 2556 and the AmeriCorps General Terms and Conditions is thorough and should be carefully considered when drafting or amending policy language for your organization.

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**Question Ranking:** #3 Senior Companion Program

**UMP Section & Question:** Section 06.01: SCP Volunteer Management - SCP Programmatic - 06.01.07

**Question Text:** Review Volunteer Assignment Plans and respond to these questions:

Select NO if any of the above criteria are not met.

- a. Are all Senior Companions performing direct services to individual clients provided written volunteer assignment plans?
- b. Do records show that the plans are approved by the sponsor and accepted by the volunteer?
- c. Do the plans identify the client(s) to be served?
- d. Do the plans address the period the client(s) will receive the volunteer's services?
- e. Do the plans identify the roles and activities of the volunteer and the expected outcomes?
- f. Are all activities included in the assignment plan compliant?

**Reference:** [45 CFR 2551.72](#), [45 CFR 2551.73](#), [45 CFR 2551.71\(a\) and \(b\)](#)

**TIP:** Senior Companion Program grantees may find it helpful to review the Senior Companion Program handbook available on the AmeriCorps website. The handbook includes a section on the volunteer assignment plan’s required elements and a sample volunteer assignment plan for reference. The handbook also contains a section entitled, “Special Limitations Including Prohibited Activities,” which may serve as a useful resource in determining if all activities in the assignment plan are compliant. Senior Companion Program directors should evaluate the sponsor organization’s current process – including frequency – of reviewing volunteer assignment plans to ensure all elements are present and all activities are compliant.

*Programmatic Review: AmeriCorps Seniors – Senior Companion Program - continued*

**Question Ranking:** #4 Senior Companion Program

**UMP Section & Question:** Section 06.01: SCP Volunteer Management - SCP Programmatic - 06.01.04

**Question Text:** Review the volunteer assignment plans and complete the required interviews. Do the volunteer's service activities align with their plan?

**Reference:** [45 CFR 2551.72](#), [45 CFR 2551.73](#), [45 CFR 2551.71](#)

**TIP:** To ensure volunteer service activities align with the volunteer assignment plan, grantees may consider developing a process to conduct regular check-ins with volunteers and station supervisors and/or a process for collecting qualitative information through station progress reports or a formal station monitoring plan. Grantees may also use volunteer and supervisor training and written resources (e.g. handbooks, manuals, etc.) to emphasize the importance of service activities' alignment with the volunteer assignment plan and notifying the Senior Companion Program Director if volunteer assignment plan updates are needed.

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**Question Ranking:** #5 Senior Companion Program

**UMP Section & Question:** Section 06.01: SCP Volunteer Management - SCP Programmatic - 06.01.06

**Question Text:** Are supervisors adequately trained by the grantee to manage volunteers?

**Reference:** SCP Regulation: [45 CFR 2551.62\(f\)](#); [45 CFR 2551.71\(a\)\(4\)](#).

**TIP:** Review the sponsoring organization's current Senior Companion Program station supervisor training policies and procedures. How often does the grantee train station supervisors, and is there a process in place to train new supervisors in a timely manner if a station experiences staff transitions? Does the grantee have documentation (e.g. a PowerPoint presentation, sign-in sheets, agenda, pre- and post-quizzes, etc.) to demonstrate that supervisor training occurred? Grantees with many stations or those who are located a significant distance from their stations may consider virtual options, such as conducting a training webinar. Senior Companion Program sponsoring organizations should ensure station supervisors have access to resources to which they may refer after the training has occurred, and these materials should clearly define the role of the Senior Companion Program station supervisor.

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# Programmatic Review: AmeriCorps Seniors – Foster Grandparent Program

## Top Five Findings

AmeriCorps Seniors	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	12	18	66.67%	07.01.07	Volunteer Management
	2	10	11	90.91%	07.03.01	Verification of Terms and Conditions
	3	9	9	100.00%	07.03.06	Verification of Terms and Conditions
	4	9	11	81.82%	07.03.02	Verification of Terms and Conditions
	5	6	18	33.33%	07.01.04	Volunteer Management

## Compliance Tips

**Question Ranking:** #1 Foster Grandparent Program

**UMP Section & Question:** Section 07.01: FGP Volunteer Management - 07.01.07

**Question Text:** Review volunteer assignment plans and respond to these questions:

- (a) Are all Foster Grandparents provided written volunteer assignment plans?
- (b) Do records show that the plans are approved by the sponsor and accepted by the Foster Grandparent?
- (c) Do the plans identify the individual child(ren) to be served?
- (d) Do the plans address the period the child(ren) will receive the volunteer's services?
- (e) Do the plans identify the roles and activities of the volunteer and the expected outcomes for the child(ren)?
- (f) Are all activities included in the volunteer assignment plan compliant?

**Reference:** Foster Grandparent Program Regulation: [45 CFR 2552.72](#)

**TIP:** Foster Grandparent Program grantees may find it helpful to review the [Foster Grandparent Program handbook](#) available on the AmeriCorps website. The handbook includes a section on the volunteer assignment plan's required elements and a sample volunteer assignment plan for reference. The handbook also contains a section entitled, "Special Limitations Including Prohibited Activities," which may serve as a useful resource in determining if all activities in the assignment plan are compliant. Foster Grandparent Program directors should evaluate the sponsor organization's current process – including frequency – of reviewing volunteer assignment plans to ensure all elements are present and all activities are compliant.

**Question Ranking:** #2 Foster Grandparent Program

**UMP Section & Question:** Section 07.03: Verification of Terms and Conditions - 07.03.01

**Question Text:** Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?

Documentation should outline the following at minimum:

- Time frames for filing and response;
- Person who receives and responds to the complaints both informal (grantee personnel) and formal (Director of the Equal Employment Opportunity Program or AmeriCorps designee);
- Documentation required;
- Legal representation is allowed;
- Freedom from retaliation/reprisal; and
- The process involved from initial filing, review, decisions made, corrective action, through close out.

**Reference:** [45 CFR 1225](#) [The following additional references are related to this question; however, they are no longer maintained within the question/compliance determination but are here to provide additional background information and context and for archival purposes. [AmeriCorps Annual General Terms and Conditions](#), NCSA § 175, 176f or § 417 of the DVSA, 2 CFR § 3187.12, [45 CFR 2540.210](#), 45 CFR 4552]

**TIP:** Regulatory language specific to grievance policies and procedures is outlined in 45 CFR 1225. The purpose of 45 CFR 1225 “is to establish a procedure for the filing, investigation, and administrative determination of allegations of discrimination based on race, color, national origin, religion, age, sex, disability or political affiliation, which arise in connection with the recruitment, selection, placement, service, or termination of AmeriCorps and AmeriCorps Seniors applicants, candidates, Members and Volunteers for part time and full time service, as appropriate.”

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The exclusion of language stating that legal representation is allowed *at any point in the grievance process* (45 CFR 1225.5)
- Documentation required (noted throughout 45 CFR 1225, should align with procedural language)
- Points of [contact](#) for formal and informal complaints. In this instance, formal refers to AmeriCorps staff and informal refers to grantee staff.
- Grantee has a grievance policy in place for employees, but not AmeriCorps members.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its grievance policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225 is thorough and should be carefully considered when drafted or amending policy language for your organization.

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**Question Ranking:** #3 Foster Grandparent Program

**UMP Section & Question:** Section 07.03: Verification of Terms and Conditions - 07.03.06

**Question Text:** Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?

- a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?
- b. Does the policy include information on civil rights requirements and non-harassment, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?
- c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), [45 CFR 2552](#)

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but noncompliant policies are very common. In addition to ensuring that your policy contains the complete list of federally required protected classes, the policy must also be communicated compliantly and effectively. This monitoring question is closely aligned with questions 05.03.01 (related to grievance procedures) and 05.03.02 (related to protected classes), meaning that findings of noncompliance for those questions can directly impact this question as well.

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The policy does not note that an organization's compliance history with its nondiscrimination policy is available upon request. This can be a simple statement included in the policy language, but it must be explicitly stated.
- Notice of nondiscrimination compliance is not included on public facing documentation, including the grantee's website, promotional materials such as brochures and flyers, and job postings. Sample language specific to this requirement can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its nondiscrimination policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225, 45 CFR 2556, and the AmeriCorps General Terms and Conditions is thorough and should be carefully considered when drafted or amending policy language for your organization.

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**Question Ranking:** #4 Foster Grandparent Program

**UMP Section & Question:** Section 07.03: Verification of Terms and Conditions - 07.03.02

**Question Text:** Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?

\*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements (\* indicates updates from previous policy). From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions.

- Race
- Color
- National origin
- Sex
- Age
- Religion
- Sexual orientation
- Disability
- Political affiliation
- Marital or parental status
- Reprisal\*
- Genetic information
- Military service
- Pregnancy\*
- Submission of a complaint\*

**Reference:** [General Terms and Conditions](#), These additional references are related to this question however are no longer maintained within the question/compliance determination. They are here to provide additional background information and context and for archival purposes. NCSA § 175, 176f or § 417 of the DVSA, [2 CFR 3187.12](#), [45 CFR 2540.210](#), 45 CFR 4552

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but very few grantees have a policy that explicitly lists all the federally required protected classes noted above. To be compliant with this monitoring question, the policy must explicitly list these classes. Variations on the language used above are strongly discouraged. Blanket language, such as “this policy does not allow discrimination against any federally protected classes,” is not comprehensive enough to be compliant. The full list of protected classes reviewed during the monitoring visit can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

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**Question Ranking:** #5 Foster Grandparent Program

**UMP Section & Question:** Section 07.01: FGP Volunteer Management - 07.01.04

**Question Text:** Review the volunteer service agreements and complete the required interviews. Do the service activities of the volunteer align with the agreement?

**Reference:** [45 CFR 2552.72](#) and [45 CFR 2552.71](#)

**TIP:** To ensure volunteer service activities align with the volunteer assignment plan, grantees may consider developing a process to conduct regular check-ins with volunteers and station supervisors and/or a process for collecting qualitative information through station progress reports or a formal station monitoring plan. Grantees may also use volunteer and supervisor training and written resources (e.g. handbooks, manuals, etc.) to emphasize the importance of service activities' alignment with the volunteer assignment plan and notifying the Foster Grandparent Program director if volunteer assignment plan updates are needed.



# Programmatic Review: AmeriCorps Seniors – Retired and Senior Volunteer Program

## Top Five Findings

	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
AmeriCorps Seniors	1	14	24	58.33%	08.02.02	Station Oversight
	2	12	16	75.00%	08.01.07	Volunteer Management
	3	11	20	55.00%	08.03.01	Verification of Terms and Conditions
	4	11	24	45.83%	08.01.05	Volunteer Management
	5	10	16	62.50%	08.03.06	Verification of Terms and Conditions

## **Compliance Tips**

**Question Ranking:** #1 Retired and Senior Volunteer Program

**UMP Section & Question:** Section 08.02: RSVP Station Oversight - 08.02.02

**Question Text:** Do Memorandum of Understandings meet the basic requirements as stated in the regulations, i.e.:

- a. Negotiated prior to volunteer placement;
- b. Specifies the mutual responsibilities of the station and sponsor;
- c. Renegotiated every 3 years;
- d. Contains the required non-discrimination commitment; and
- e. Contains the required reasonable accommodation language?

**Reference:** Retired and Senior Volunteer Program Regulation: [45 CFR 2553.23\(c\)\(2\)](#)

**TIP:** If a station Memorandum of Understanding is missing any of the elements listed above, it is noncompliant. Chapter 6 in the Retired and Senior Volunteer Program Handbook (available on the AmeriCorps website) covers Memorandums of Understanding in detail, and there is a sample Memorandum of Understanding available in the handbook appendix and on the Retired and Senior Volunteer Program page of the AmeriCorps website. Grantees may reference these resources to develop a template that includes all components listed above (as well as any additional elements your agency may require) for MOUs moving forward and should review current Memorandum of Understandings to ensure they include all required elements.

**Question Ranking:** #2 Retired and Senior Volunteer Program

**UMP Section & Question:** Section 08.01: RSVP Volunteer Management - RSVP Programmatic - 08.01.07

**Question Text:** Does the grantee recognize AmeriCorps support?

- Are projects visually identified as AmeriCorps (including, but not limited to logos, websites, social media, service gear and clothing) and following AmeriCorps brand guidelines?
- Are members provided information that projects are part of AmeriCorps?
- Are there alterations to AmeriCorps logos or other brand identities? If yes, did the grantee receive prior written approval from AmeriCorps?
- If applicable, do agreements with subsites explicitly state that the program is an AmeriCorps program?

**Reference:** [General Terms and Conditions](#)

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**Question Ranking:** #3 Retired and Senior Volunteer Program

**UMP Section & Question:** Section 08.03: Verification of Terms and Conditions - 08.03.01

**Question Text:** Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?

Documentation should outline the following at minimum:

- Time frames for filing and response;
  - Person who receives and responds to the complaints both informal (grantee personnel) and formal (Director of the Equal Employment Opportunity Program or AmeriCorps designee);
  - Documentation required;
  - Legal representation is allowed;
  - Freedom from retaliation/reprisal; and
- The process involved from initial filing, review, decisions made, corrective action, through close out.

**Reference:** [45 CFR 1225](#)

**TIP:** Regulatory language specific to grievance policies and procedures is outlined in 45 CFR 1225. The purpose of 45 CFR 1225 “is to establish a procedure for the filing, investigation, and administrative determination of allegations of discrimination based on race, color, national origin, religion, age, sex, disability or political affiliation, which arise in connection with the recruitment, selection, placement, service, or termination of AmeriCorps and AmeriCorps Seniors applicants, candidates, Members and Volunteers for **part-time** and full-time service, as appropriate.”

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The exclusion of language stating that legal representation is allowed *at any point in the grievance process* (45 CFR 1225.5)
- Documentation required (noted throughout 45 CFR 1225, should align with procedural language)
- Points of [contact](#) for formal and informal complaints. In this instance, formal refers to AmeriCorps staff and informal refers to grantee staff.
- Grantee has a grievance policy in place for employees, but not AmeriCorps members.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its grievance policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225 is thorough and should be carefully considered when drafted or amending policy language for your organization.

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**Question Ranking:** #4 Retired and Senior Volunteer Program

**UMP Section & Question:** Section 08.01: RSVP Volunteer Management - RSVP Programmatic - 08.01.05

**Question Text:** Are supervisors adequately trained by the grantee to manage volunteers?

**Reference:** Retired and Senior Volunteer Program Regulation: [45 CFR 2553.62\(b\)](#); [45 CFR 2553.62\(f\)\(3\)](#)

**TIP:** Review the sponsoring organization’s current Retired and Senior Volunteer Program station supervisor training policies and procedures. How often does the grantee train station supervisors, and is there a process in place to train new supervisors in a timely manner if a station experiences staff transitions? Does the grantee have documentation (e.g. a PowerPoint presentation, sign-in sheets, agenda, pre- and post-quizzes, etc.) to demonstrate that supervisor training occurred? Grantees with many stations or those who are located a significant distance from their stations may consider virtual options, such as conducting a training webinar. Retired and Senior Volunteer Program sponsoring organizations should ensure station supervisors have access to resources to which they may refer after the training has occurred, and these materials should clearly define the role of the Retired and Senior Volunteer Program volunteer supervisor.

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**Question Ranking:** #5 Retired and Senior Volunteer Program

**UMP Section & Question:** Section 08.03: Verification of Terms and Conditions - 08.03.06

**Question Text:** Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination and non-harassment?

- a. Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?
- b. Does the policy include information on civil rights requirements and non-harassment, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and posted in prominent locations, as appropriate?
- c. Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), [45 CFR 2553](#)

**TIP:** Nearly every grantee monitored by our office has a nondiscrimination policy in place, but noncompliant policies are very common. In addition to ensuring that your policy contains the complete list of federally required protected classes, the policy must also be communicated compliantly and effectively. This monitoring question is closely aligned with questions 05.03.01 (related to grievance procedures) and 05.03.02 (related to protected classes), meaning that findings of noncompliance for these questions can directly impact this question as well.

A compliant policy will incorporate, at minimum, the elements listed above. Common areas of noncompliance are:

- The policy does not note that an organization's compliance history with its nondiscrimination policy is available upon request. This can be a simple statement included in the policy language, but it must be explicitly stated.
- Notice of nondiscrimination compliance is not included on public facing documentation, including the grantee's website, promotional materials such as brochures and flyers, and job postings. Sample language specific to this requirement can be found in Section M.1 of the AmeriCorps General Terms and Conditions.

While these are common areas of noncompliance, the grantee is strongly encouraged to review its nondiscrimination policies on an annual basis to confirm compliance. Regulatory language contained in 45 CFR 1225, 45 CFR 2556 and the AmeriCorps General Terms and Conditions is thorough and should be carefully considered when drafted or amending policy language for your organization.

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## Prohibited Activities

### Top Five Findings

Overall	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number
	1	35	99	35.35%	10.01.03
	2	32	92	34.78%	10.01.06
	3	28	99	28.28%	10.01.02
	4	27	88	30.68%	10.01.01
	5	17	98	17.35%	10.01.07
AmeriCorps State and National	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number
	1	3	23	13.04%	10.01.07
	2	2	22	9.09%	10.01.01
	3	2	22	9.09%	10.01.02
	4	2	22	9.09%	10.01.03
	5	1	23	4.35%	10.01.04
AmeriCorps Seniors	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number
	1	30	50	60.00%	10.01.03
	2	30	48	62.50%	10.01.06
	3	24	50	48.00%	10.01.02
	4	18	44	40.91%	10.01.01
	5	11	50	22.00%	10.01.07
VISTA	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number
	1	7	22	31.82%	10.01.01
	2	3	23	13.04%	10.01.07
	3	3	24	12.50%	10.01.03
	4	2	24	8.33%	10.01.02
	5	1	20	5.00%	10.01.06

### Compliance Tips

**Question Ranking:** #1 Overall, #4 AmeriCorps State and National, #1 AmeriCorps Seniors, #3 AmeriCorps VISTA

**UMP Question:** 10.01.03

**Question Text:** Do prime staff provide appropriate training to members/volunteers on prohibited activities?

**Reference:** General Prohibited Activities References

General: [45 CFR 2540.100](#); [45 CFR 1226.8](#); [45 CFR 1226.10](#)

Exceptions: [45 CFR 1226.9](#)

## *Prohibited Activities - continued*

### **AmeriCorps State and National Prohibited Activities References**

General: [45 CFR 2520.65](#)

Fundraising: [45 CFR 2520.40](#); [45 CFR 2520.45](#)

### **AmeriCorps VISTA Prohibited Activities References**

General: [45 CFR 2556.710](#); [45 CFR 2556.745-750](#); [45 CFR 2556.770-780](#); [45 CFR 2556.150](#); [45 CFR 2556.175](#)

Exceptions: [45 CFR 2556.715-740](#); [45 CFR 2556.755-760](#)

### **AmeriCorps Seniors**

Foster Grandparent Program: [45 CFR 2552.121](#)

Retired and Senior Volunteer Program: [45 CFR 2553.91](#)

Senior Companion Program: [45 CFR 2551.121](#)

**TIP:** Typically, comprehensive training on prohibited activities is provided during member and volunteer onboarding and orientation, but it shouldn't stop there. Other opportunities for training include adding prohibited activities refreshers to regularly scheduled check-ins throughout the year or holding an additional prohibited activities training at the half way point of service for time bound members. For members and volunteers who serve more than one term or who serve over a longer time period like AmeriCorps Seniors Volunteers, it is important to ensure prohibited activities are not only discussed at the initial point of onboarding but are covered at multiple points throughout their service. Many organizations post lists of prohibited activities in their offices and service sites as a reminder to staff and members/volunteers.

---

**Question Ranking:** #2 Overall, #2 AmeriCorps Seniors, #5 AmeriCorps VISTA

**UMP Question:** 10.01.06

**Question Text:** Do prime staff provide appropriate monitoring and oversight of service sites with regard to prohibited activities?

**Reference:** General Prohibited Activities References

General: [45 CFR 2540.100](#); [45 CFR 1226.8](#); [45 CFR 1226.10](#)

Exceptions: [45 CFR 1226.9](#)

### **AmeriCorps State and National Prohibited Activities References**

General: [45 CFR 2520.65](#)

Fundraising: [45 CFR 2520.40](#); [45 CFR 2520.45](#)

## *Prohibited Activities - continued*

### **AmeriCorps VISTA Prohibited Activities References**

General: [45 CFR 2556.710](#); [45 CFR 2556.745-750](#); [45 CFR 2556.770-780](#); [45 CFR 2556.150](#); [45 CFR 2556.175](#)

Exceptions: [45 CFR 2556.715-740](#); [45 CFR 2556.755-760](#)

### **AmeriCorps Seniors**

Foster Grandparent Program: [45 CFR 2552.121](#)

Retired and Senior Volunteer Program: [45 CFR 2553.91](#)

Senior Companion Program: [45 CFR 2551.121](#)

[2 CFR 200.303](#) (c) and [2 CFR 200.329](#)(a)

**TIP:** Every prime grantee and sponsor should have a monitoring and oversight policy outlining how they monitor their subsites, volunteer stations, etc. for compliance with program and federal rules and regulations. While monitoring covers a variety of topics, you should ensure that the monitoring tool, checklist, or procedure used in your organization includes prohibited activity components like performing member interviews to determine if members and volunteers are aware and have been trained on prohibited activities, requesting samples of training completed on the topic by site supervisors, and interviewing members about their day to day tasks to ensure they are not participating in any prohibited activities.

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**Question Ranking:** #3 Overall, #3 AmeriCorps State and National, #3 AmeriCorps Seniors, #4 AmeriCorps VISTA

**UMP Question:** 10.01.02

**Question Text:** Are members/volunteers, site supervisors, and prime staff aware of prohibited activities applicable to their respective programs?

**Reference:** General Prohibited Activities References

General: [45 CFR 2540.100](#); [45 CFR 1226.8](#); [45 CFR 1226.10](#)

Exceptions: [45 CFR 1226.9](#)

### **AmeriCorps State and National Prohibited Activities References**

General: [45 CFR 2520.65](#)

Fundraising: [45 CFR 2520.40](#); [45 CFR 2520.45](#)

### **AmeriCorps VISTA Prohibited Activities References**

General: [45 CFR 2556.710](#); [45 CFR 2556.745-750](#); [45 CFR 2556.770-780](#); [45 CFR 2556.150](#); [45 CFR 2556.175](#)

Exceptions: [45 CFR 2556.715-740](#); [45 CFR 2556.755-760](#)

## *Prohibited Activities - continued*

### **AmeriCorps Seniors**

Foster Grandparent Program: [45 CFR 2552.121](#)

Retired and Senior Volunteer Program: [45 CFR 2553.91](#)

Senior Companion Program: [45 CFR 2551.121](#)

**TIP:** Typically, comprehensive training on prohibited activities is provided during member/volunteer onboarding and orientation. But it shouldn't stop there! Other opportunities for training include adding prohibited activities refreshers to regularly scheduled check-ins throughout the year, or holding an additional prohibited activities training at the half way point of service for time bound members. For members/volunteers who serve more than one term or who serve over a longer time period like AmeriCorps Seniors Volunteers, it is important to ensure prohibited activities are not only discussed at the initial point of onboarding, but are covered at multiple points throughout their service. Many organizations post lists of prohibited activities in their offices and service sites as a reminder to staff and members/volunteers.

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**Question Ranking:** #4 Overall, #2 AmeriCorps State and National, #4 AmeriCorps Seniors, #1 AmeriCorps VISTA

**UMP Question:** 10.01.01

**Question Text:** Do member/volunteer service activities align with their position descriptions/assignment plans?

**Reference:** General Prohibited Activities References

General: [45 CFR 2540.100](#); [45 CFR 1226.8](#); [45 CFR 1226.10](#)

Exceptions: [45 CFR 1226.9](#)

### **AmeriCorps State and National Prohibited Activities References**

General: [45 CFR 2520.65](#)

Fundraising: [45 CFR 2520.40](#); [45 CFR 2520.45](#)

### **AmeriCorps VISTA Prohibited Activities References**

General: [45 CFR 2556.710](#); [45 CFR 2556.745-750](#); [45 CFR 2556.770-780](#); [45 CFR 2556.150](#); [45 CFR 2556.175](#)

Exceptions: [45 CFR 2556.715-740](#); [45 CFR 2556.755-760](#)

### **AmeriCorps Seniors**

Foster Grandparent Program: [45 CFR 2552.121](#)

Retired and Senior Volunteer Program: [45 CFR 2553.91](#)

Senior Companion Program: [45 CFR 2551.121](#)



## *Prohibited Activities - continued*

**TIP:** When developing assignment or position descriptions, prime grantee and sponsor staff should include a step in this process to review them specifically for possible exposure to prohibited activities. However, even if an assignment or position description doesn't include prohibited activities, it may be possible for members and volunteers to take part in them. That is why it is important that as part of regularly scheduled monitoring of subsites, volunteer stations, etc., you are interviewing members to understand what their day-to-day activity looks like and comparing it to their approved assignment/position descriptions. If there are any discrepancies, they should be addressed by either curtailing the duties not listed on the approved assignment or position descriptions or by updating, reviewing, and approving a new description to incorporate additional compliant tasks.

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**Question Ranking:** #5 Overall, #1 AmeriCorps State and National, #5 AmeriCorps Seniors, #2 AmeriCorps VISTA

**UMP Question:** 10.01.07

**Question Text:** Do interviews indicate that members/volunteers and prime staff do NOT engage in prohibited activities?

**Reference:** General Prohibited Activities References

General: [45 CFR 2540.100](#); [45 CFR 1226.8](#); [45 CFR 1226.10](#)

Exceptions: [45 CFR 1226.9](#)

### **AmeriCorps State and National Prohibited Activities References**

General: [45 CFR 2520.65](#)

Fundraising: [45 CFR 2520.40](#); [45 CFR 2520.45](#)

### **AmeriCorps VISTA Prohibited Activities References**

General: [45 CFR 2556.710](#); [45 CFR 2556.745-750](#); [45 CFR 2556.770-780](#); [45 CFR 2556.150](#); [45 CFR 2556.175](#)

Exceptions: [45 CFR 2556.715-740](#); [45 CFR 2556.755-760](#)

### **AmeriCorps Seniors**

Foster Grandparent Program: [45 CFR 2552.121](#)

Retired and Senior Volunteer Program: [45 CFR 2553.91](#)

Senior Companion Program: [45 CFR 2551.121](#)

**TIP:** The best way to ensure members are not participating in prohibited activities are detailed above - training at both the volunteer/member and supervisor level, thoroughly reviewed and approved assignment/position descriptions, and active and consistent monitoring at the service site/volunteer station level will help to decrease the risk of member/volunteer participation in prohibited activities.

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## *Prohibited Activities - continued*

**Question Ranking:** #5 AmeriCorps State and National

**UMP Question:** 10.01.04

**Question Text:** Do prime staff provide appropriate training to site supervisors on prohibited activities?

**Reference:** General Prohibited Activities References

General: [45 CFR 2540.100](#); [45 CFR 1226.8](#); [45 CFR 1226.10](#)

Exceptions: [45 CFR 1226.9](#)

### **AmeriCorps State and National Prohibited Activities References**

General: [45 CFR 2520.65](#)

Fundraising: [45 CFR 2520.40](#); [45 CFR 2520.45](#)

### **AmeriCorps VISTA Prohibited Activities References**

General: [45 CFR 2556.710](#); [45 CFR 2556.745-750](#); [45 CFR 2556.770-780](#); [45 CFR 2556.150](#); [45 CFR 2556.175](#)

Exceptions: [45 CFR 2556.715-740](#); [45 CFR 2556.755-760](#)

### **AmeriCorps Seniors**

Foster Grandparent Program: [45 CFR 2552.121](#)

Retired and Senior Volunteer Program: [45 CFR 2553.91](#)

Senior Companion Program: [45 CFR 2551.121](#)

**TIP:** Similar to how training is provided to members/volunteers, comprehensive training on prohibited activities is typically provided to site supervisors when they are coming onboard the program. But it shouldn't stop there! Especially since site supervisors may oversee sites for multiple years in a row, prime grantees/sponsors should ensure there is at least annual training for the supervisory staff on prohibited activities, so that the knowledge and awareness is not lost year over year.

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## New To AmeriCorps

### Top Five Findings

Overall	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	48	49	97.96%	11.02.03	Terms and Conditions: Public Notice
	2	46	49	93.88%	11.02.01	Terms and Conditions: Grievance Policy
	3	41	49	83.67%	11.02.02	Terms and Conditions: Nondiscrimination
	4	37	39	94.87%	11.01.05	FOFA: Internal Controls
	5	33	48	68.75%	11.02.04	Programmatic: AmeriCorps Branding
AmeriCorps State and National	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	17	17	100.00%	11.01.05	FOFA: Internal Controls
	2	17	17	100.00%	11.02.01	Terms and Conditions: Grievance Policy
	3	16	17	94.12%	11.02.03	Terms and Conditions: Public Notice
	4	15	17	88.24%	11.01.08	FOFA: Procurement
	5	15	17	88.24%	11.02.02	Terms and Conditions: Nondiscrimination
AmeriCorps Seniors	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	16	16	100.00%	11.02.03	Terms and Conditions: Public Notice
	2	15	16	93.75%	11.01.05	FOFA: Internal Controls
	3	15	16	93.75%	11.01.08	FOFA: Procurement
	4	13	16	81.25%	11.01.03	FOFA: Federal Cash Management
	5	13	16	81.25%	11.02.02	Terms and Conditions: Nondiscrimination
VISTA	Ranking	Not Compliant	Total Reviewed	Noncompliance Finding Rate	Question Number	Compliance Category
	1	16	16	100.00%	11.02.03	Terms and Conditions: Public Notice
	2	14	16	87.50%	11.02.01	Terms and Conditions: Grievance Policy
	3	13	16	81.25%	11.02.02	Terms and Conditions: Nondiscrimination
	4	13	16	81.25%	11.02.04	Programmatic: AmeriCorps Branding
	5	5	6	83.33%	11.01.05	FOFA: Internal Controls

### Compliance Tips

**Question Ranking:** #1 Overall, #3 AmeriCorps State and National, #1 AmeriCorps Seniors, #1 AmeriCorps VISTA

**UMP Section & Question:** Section 11.02: Program Specific - 11.02.03

**Question Text:** Does the grantee notify members, community beneficiaries, applicants, program staff, and the public, including those with impaired vision or hearing, that it operates in accordance with federal and program requirements on non-discrimination?

- Does the policy summarize the requirements, note the availability of compliance history information, and explain the procedures for filing discrimination complaints with AmeriCorps?
- Does the policy include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member/volunteer service agreements, handbooks, manuals, pamphlets, and post it in prominent locations, as appropriate?

## New To AmeriCorps - continued

- Does the sponsor/grantee notify the public in recruitment material and application forms that it operates its program or activity subject to nondiscrimination requirements?

**Reference:** [AmeriCorps Annual General Terms and Conditions](#), relevant program regulations: [45 CFR Parts 2540 \(ASN\)](#), [45 CFR 2551 \(SCP\)](#), [45 CFR 2552 \(FGP\)](#), [45 CFR 2553 \(RSVP\)](#), and [45 CFR 2556 \(VISTA\)](#).

### TIP:

- It is helpful to review Section M. Non-Discrimination Public Notice and Records Compliance in AmeriCorps Annual General Terms and Conditions when developing policies related to this question. It provides sample language that can be used word for word in your recruitment material.
- Several documents are needed to show compliance with this question. Oftentimes, only one nondiscrimination policy is submitted, but monitoring officers are looking to see how you are notifying the public of your nondiscrimination practices. Job postings, websites, brochures, manuals, and office posters are all methods of relaying information to the public.
- Many policies are not noting the availability of compliance history information. A statement within policy or public-facing material like websites or brochures stating, "compliance history information to AmeriCorps is available upon request" or "requests for compliance history information may be sent to [contact person email/phone/website link]" is acceptable.

---

**Question Ranking:** #2 Overall, #2 AmeriCorps State and National, #2 AmeriCorps VISTA

**UMP Section & Question:** Section 11.02: Program Specific - 11.02.01

**Question Text:** Is there documentation to show that the recipient maintains a procedure for the filing and adjudication of grievances in alignment with 45 CFR § 1225?

Documentation should outline the following at minimum:

- Time frames for filing and response;
- Person who receives and responds to the complaints both informal (grantee personnel) and formal (Director of the Equal Employment Opportunity Program or AmeriCorps designee);
- Documentation required;
- Legal representation is allowed;
- Freedom from retaliation/reprisal; and
- The process involved from initial filing, review, decisions made, corrective action, through close out.

If NO, write a brief explanation in the notes section below.

**Reference:** [45 CFR 1225](#)

## New To AmeriCorps - continued

### TIP:

- 45 CFR 1225: Each AmeriCorps program has a specific Code of Federal Regulations regarding grievance procedures. The Office of Monitoring uses 45 CFR 1225 as a baseline for consistent grievance policy and procedure for all AmeriCorps grant recipients.
- Documentation required: All formal complaints must be documented. When developing or revising your grievance procedure, consider how each stage of the procedure is documented. If you were asked to submit documents for a complaint, what would be included to reflect the lifecycle of that complaint?
- Grievance procedures for AmeriCorps members and/or grant covered staff must provide guidance for filing complaints directly to AmeriCorps; this is often overlooked.

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**Question Ranking:** #3 Overall, #4 AmeriCorps State and National, #1 AmeriCorps Seniors, #3 AmeriCorps VISTA

**UMP Section & Question:** Section 11.02: Program Specific - 11.02.02

**Question Text:** Does the organization have a non-discrimination policy that includes all the federally required protected classes as listed below?

\*NOTE: Updated in the AmeriCorps Program Civil Rights and Non-Harassment Policy 11/7/23. Compliance should be determined based on grant award requirements (\* indicates updates from previous policy). From time to time, there may be updates to the list of protected classes. Organizations should confirm their list against the list included in the AmeriCorps general terms and conditions.

- |                   |                              |                              |
|-------------------|------------------------------|------------------------------|
| • Race            | • Religion                   | • Reprisal*                  |
| • Color           | • Sexual orientation         | • Genetic information        |
| • National origin | • Disability                 | • Military service           |
| • Sex             | • Political affiliation      | • Pregnancy*                 |
| • Age             | • Marital or parental status | • Submission of a complaint* |

**Reference:** [AmeriCorps Annual General Terms and Conditions](#)

### TIP:

- The list of federally protected classes has the potential to change from year to year; implementing an annual review of your non-discrimination policy would capture year-to-year changes.
- Leadership approved addendum or bridge policies specific to your AmeriCorps program are acceptable.
- The line, "and all other federally recognized protected classes" is not accepted in lieu of missing protected classes within policy. The expectation is to include all the classes outlined in grant Terms and Conditions.



## *New To AmeriCorps - continued*

**Question Ranking:** #4 Overall, #1 AmeriCorps State and National, #2 AmeriCorps Seniors, #5 AmeriCorps VISTA

**UMP Section & Question:** Section 11.01: Reporting - 11.01.05

**Question Text:** Does the sponsor's/grantee's written financial policies explicitly state the internal controls in place, consistent with the workbook's results?

**Reference:** [2 CFR 200.303](#)

**TIP:** When developing or revising financial policies, any activity listed on the segregation of duties worksheet being performed at your organization must be documented in your fiscal policies and procedures.

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**Question Ranking:** #5 Overall, #4 AmeriCorps VISTA

**UMP Section & Question:** Section 11.02: Program Specific - 11.02.04

**Question Text:** Does the grantee have a system to follow required timekeeping practices for their members/volunteers?

### **For AmeriCorps State and National:**

Member fundraising time is limited to 10 percent of the maximum allowable number of service hours, and member training is limited to 20 percent or less of the total aggregate agreed-upon member service hours in the program. Does the program have a process and corresponding timekeeping documentation for ensuring member hours are tracked and do not exceed the percentage limits for:

- Fundraising and
- Member education and training.

### **For AmeriCorps VISTA:**

- Is there evidence that AmeriCorps VISTAs, summer associates, and/or AmeriCorps VISTA leaders are serving full-time, as defined by the host site? (Does the sponsor define full-time service? Does timekeeping documentation reflect full-time service of members?)
- Is there evidence that the grantee is documenting time attendance in relation to all variations of allowed leave benefits for AmeriCorps VISTA members? (Does timekeeping documentation show a way to document all variations of leave?)

### **For AmeriCorps Seniors:**

- Does the grantee maintain timesheets or electronic time and attendance records that: Display the actual hours served by each volunteer?
- Are signed or validated by the individual volunteer and the responsible volunteer station supervisor (on the template, is there a place for signatures/certification?)

## *New To AmeriCorps - continued*

**Reference:** AmeriCorps State and National - [45 CFR 2520.45](#) and [45 CFR 2520.50](#)  
ACS: [45 CFR 2552.51](#)

AmeriCorps VISTA: DVSA Sec. 104, [42 U.S.C. § 4954](#) (a), [45 CFR 2556.205](#), AmeriCorps VISTA Member Handbook Chapter 1

**TIP:** In New to AmeriCorps, oftentimes grantees are implementing effective timekeeping systems, but they are not documented in policy. All aspects of the procedure should be documented including how supervisors are monitoring and/or approving service hours.

For AmeriCorps State and National:

- Most timekeeping systems can separate fundraising activities from training and education activities but fail to explain how the thresholds are monitored.

For AmeriCorps VISTA:

- The AmeriCorps VISTA program doesn't require timesheets for tracking hours, but it does require that supervisors monitor their AmeriCorps VISTA members for full-time service and track their AmeriCorps VISTA members use of leave benefits.
- When developing or revising your timekeeping policies, consider your organization's definition of full-time service expectations for your AmeriCorps VISTA members.
- AmeriCorps VISTA members are entitled to personal leave, sick leave, and emergency leave. Emergency leave is often overlooked in timekeeping policies for AmeriCorps VISTA members.

For AmeriCorps Seniors:

- Each AmeriCorps Seniors program stream includes detailed guidance on timekeeping requirements within the operational handbooks, including sample templates. When developing or revising your timekeeping policies, the operational handbook is a great starting point.

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**Question Ranking:** #4 AmeriCorps State and National, #3 AmeriCorps Seniors

**UMP Section & Question:** Section 11.01: REPORTING - 11.01.08

**Question Text:** If there is a [procurement] policy, does it include the following minimum elements?

- Standards of conduct that cover at minimum conflicts of interest and disciplinary actions to be applied for violations of such standards;
- Delineation of purchase thresholds;
- Single source provisions; and
- Necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

**Reference:** [2 CFR 200.317-327](#)



## *New To AmeriCorps - continued*

### **TIP:**

- The standards of conduct must also include disciplinary actions to be applied for violations of standards.
- Many policies do not include “labor surplus area firms” in their necessary affirmative steps.
- Even small organizations without experience with large purchases are required to have a procurement policy because it is part of uniform guidance (2 CFR 200).

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**Question Ranking:** #4 AmeriCorps Seniors

**UMP Section & Question:** Section 11.01: REPORTING - 11.01.03

**Question Text:** If there is a policy and procedure to manage cash drawdowns, do they include the following minimum elements?

- Cash is drawn on a reimbursement or ‘as-needed’ basis, and not held in excess of three (3) working days
- Procedural steps that outline the approval and drawdown process, including who is responsible for each action

**Reference:** [2 CFR 200.305](#), PMS Payment Certification

**TIP:** Many times, newer grantees can answer questions on how cash is pulled from Payment Management System and who performs the tasks. They have a procedure in practice, but not in documented policy. Any procedures related to performing financial activities should be outlined in policy.

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## National Service Criminal History Check (NSCHC)

All of the ranked issue statements were compiled from answers to "Section 09.03: NSCHC Records - Question 09.03.01: Were all NSCHC records compliant?"

### Top Five Findings

Overall	Issue Ranking	Occurrences	Records Reviewed	Issue %	Issue Statement
	1	349	2,241	15.57%	18. FBI Check Not Adjudicated
2	125	2,241	5.58%	15. FBI Check Not Adjudicated On Time	
3	79	2,241	3.53%	14. State Check(s) Not Adjudicated On Time	
4	77	2,241	3.44%	13. NSOPW Check Not Adjudicated On Time	
5	54	2,241	2.41%	1. Missing NSOPW Check	
AmeriCorps State and National	Issue Ranking	Occurrences	Records Reviewed	Issue %	Issue Statement
	1	44	1,106	3.98%	15. FBI Check Not Adjudicated On Time
2	41	1,106	3.71%	14. State Check(s) Not Adjudicated On Time	
3	33	1,106	2.98%	13. NSOPW Check Not Adjudicated On Time	
4	32	1,106	2.89%	18. FBI Check Not Adjudicated	
5	27	1,106	2.44%	1. Missing NSOPW Check	
AmeriCorps Seniors	Issue Ranking	Occurrences	Records Reviewed	Issue %	Issue Statement
	1	315	1,103	28.56%	18. FBI Check Not Adjudicated
2	81	1,103	7.34%	15. FBI Check Not Adjudicated On Time	
3	41	1,103	3.72%	13. NSOPW Check Not Adjudicated On Time	
4	39	1,103	3.54%	16. NSOPW Check Not Adjudicated	
5	38	1,103	3.45%	17. State Check(s) Not Adjudicated	
VISTA	Issue Ranking	Occurrences	Records Reviewed	Issue %	Issue Statement
	1	3	19	15.79%	13. NSOPW Check Not Adjudicated On Time
2	2	19	10.53%	6. State Check Not From Approved Source	
3	2	19	10.53%	7. FBI Check Not From Approved Source	
4	2	19	10.53%	8. NSOPW Check Not Nationwide	
5	2	19	10.53%	14. State Check(s) Not Adjudicated On Time	

### Compliance Tips

**Issue Significance:** #1 Overall, #4 AmeriCorps State and National, #1 AmeriCorps Seniors

**Issue Number:** 18. FBI Check Not Adjudicated

**Reference:** [45 CFR § 2540.205](#)

## National Service Criminal History Check (NSCHC) - continued

**Issue Significance:** #4 AmeriCorps Seniors

**Issue Number:** 16. NSOPW Check Not Adjudicated

**Reference:** [45 CFR § 2540.205](#)

**Issue Significance:** #5 AmeriCorps Seniors

**Issue Number:** 17. State Check(s) Not Adjudicated

**Reference:** [45 CFR § 2540.205](#)

### TIP:

- You must document your review and eligibility determination (adjudication) based on check results, including documenting when this review took place. Maintaining printouts of check results is generally not sufficient documentation of when you reviewed the results.
- Checklists, memos-to-file, or other file documents recording your check review outcomes and dates of review are good practices.
- The AmeriCorps approved vendors, Truescreen and Fieldprint, allow you to document your adjudication in their systems. They provide monitoring reports you can download to ensure you have completed your adjudication for each individual. Refer to the following resources for instructions:
  - "Using AmeriCorps Approved Vendors Truescreen and Fieldprint" on the [NSCHC webpage](#);
  - "Truescreen AmeriCorps 2.0 User Guide" in [Litmos](#); and
  - "Fieldprint AmeriCorps Grantee Guide" in [Litmos](#).

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**Issue Significance:** #2 Overall, #1 AmeriCorps State and National, #2 AmeriCorps Seniors

**Issue Number:** 15. FBI Check Not Adjudicated On Time

**Reference:** [45 CFR § 2540.205](#)

**Issue Significance:** #3 Overall, #2 AmeriCorps State and National, #5 AmeriCorps VISTA

**Issue Number:** 14. State Check(s) Not Adjudicated On Time

**Reference:** [45 CFR § 2540.205](#)

**Issue Significance:** #4 Overall, #3 AmeriCorps State and National, #3 AmeriCorps Seniors, #1 AmeriCorps VISTA

**Issue Number:** 13. NSOPW Check Not Adjudicated On Time

**Reference:** [45 CFR § 2540.205](#)

## National Service Criminal History Check (NSCHC) - continued

### TIP:

- You must document your review and eligibility determination (adjudication) based on check results, including documenting when this review took place. You must adjudicate all checks before the individual's start date (this includes training/orientation hours paid from the grant).
  - Make reviewing checks part of your onboarding procedures. Use checklists or Truescreen/Fieldprint monitoring reports to ensure all checks are completed and adjudicated before the individual's start date.
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**Issue Significance:** #5 Overall, #5 AmeriCorps State and National

**Issue Number:** 1. Missing NSOPW Check

**Reference:** [45 CFR § 2540.204](#)

### TIP:

- You must maintain documentation that checks were completed, including the check results.
  - Make reviewing checks part of your onboarding procedures. Use checklists or Truescreen/Fieldprint monitoring reports to ensure you have documentation that all checks are completed and adjudicated before the individual's start date.
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**Issue Significance:** #2 AmeriCorps VISTA

**Issue Number:** 6. State Check Not From Approved Source

**Reference:** [45 CFR § 2540.204](#)

**Issue Significance:** #3 AmeriCorps VISTA

**Issue Number:** 7. FBI Check Not From Approved Source

**Reference:** [45 CFR § 2540.204](#)

### TIP:

- AmeriCorps approved vendors, Truescreen and Fieldprint, are approved check sources.
- If you are not using the approved vendors, you should go directly to the NSOPW.gov website and the AmeriCorps-designated state repository to ensure your checks are compliant with NSCHC regulations. The AmeriCorps-designated state repositories are listed in the "Using NSOPW and State Repositories Manual," found on the [NSCHC webpage](#).

## *National Service Criminal History Check (NSCHC) - continued*

**Issue Significance:** #4 AmeriCorps VISTA

**Issue Number:** 8. NSOPW Check Not Nationwide

**Reference:** [45 CFR § 2540.204](#)

**TIP:**

- NSOPW checks completed through AmeriCorps-approved vendor, Truescreen, are always nationwide checks.
  - If completing the NSOPW check directly through NSOPW.gov website, see instructions in the "Using NSOPW and State Repositories Manual," found on the [NSCHC webpage](#). Do not limit the search geographically. If any jurisdictions are not reporting on the results, try conducting the NSOPW search later or supplement the NSOPW check by directly checking the state registry that was out of service.
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