

## Office of Monitoring Frequently Asked Questions (FAQ)

December 2020

The Office of Monitoring (OM) was created in 2019 to centralize grant monitoring functions in one office, and to ensure appropriate separation of duties so that program management and monitoring activities are administered separately. OM's new monitoring systems centralize compliance monitoring and simplify monitoring standards. Below are common questions asked by awardees during our first round of monitoring. If you have questions or concerns, please reach out to [monitoring@cns.gov](mailto:monitoring@cns.gov) or the Monitoring Officer assigned to your grant.

**Q: Will OM's monitoring tool be available for awardees to self-monitor?**

A: Yes; we plan to release the monitoring toolkit later in FY21. We are making updates and reviewing feedback from our first round of monitoring to find ways to improve our work and make the process simpler for all parties. Our goal is to have these monitoring tools available to all AmeriCorps awardees as a resource for self-assessment, preparation for monitoring, and improving compliance with federal regulations. We will inform the AmeriCorps programs when these tools are available and work with them to provide the tools to you.

**Q: Are there tools awardees can use for developing internal risk assessments?**

A: OM will provide awardees with access to our monitoring tool templates and corrective action planning guides so that you may consider them in developing internal risk assessments. However, the criteria used in the AmeriCorps grant portfolio risk assessment module is specific to risk posed to our federal agency. The agency uses data collected from awardees, as well as information from publicly available sources to reach risk determinations. Awardees are responsible for assessing risks posed to their organizations to guarantee grant funding is used for its



intended purposes. Risk assessment tools and criteria vary across organizations. You can refer to the [Uniform Guidance](#) to learn more about assessing risk.

**Q: What is the “risk model” and how is it used to select awardees for monitoring?**

A: All federal funders, including AmeriCorps, are required to monitor awardees. Limited resources required OM to direct monitoring resources to areas that pose specific risks to the agency. AmeriCorps uses a data-driven, internal risk assessment module which categorizes grants by a level of risk, and groups these risk and performance indicators into the following categories: financial, programmatic, organizational, and compliance.

This risk model informs OM of the type of issue-specific monitoring activities that should be assigned to grants. Monitoring activity assignments are not made randomly. The agency’s integration of risk rating criteria to monitoring assignments helps with internal assessment of the monitoring framework and identifies areas of improvement. In addition, OM does not limit its monitoring activities to high risk awardees; we include lower risk recipients in an effort to assess the risk assessment methodology.

Monitoring selections contribute to AmeriCorps’ efforts to identify strengths in practices among awardees and to identify compliance trends that may inform broader technical assistance and training strategies. While AmeriCorps does not release risk assessment scores per awardee, the specific monitoring activities assigned to awardees are based on the type of risk categories identified for the grant program.

**Q: OM references a goal of collecting longitudinal data through its monitoring activities. What does longitudinal data include?**

A: OM is currently conducting its first cycle of monitoring; however, as OM begins to collect monitoring results, we can identify national and regional trends across grant



programs. The results of individual awardee monitoring activities will support a broader, more complete evaluation of the best practices among AmeriCorps awardees and help provide future technical assistance and training initiatives.

**Q: How is a program selected for an onsite monitoring visit?**

A: Awardees are selected for monitoring based on a risk-based framework. AmeriCorps has gathered data from past and current grant performance and matched it to risk indicators. OM uses this information to select which grants to monitor, and the type of monitoring activity we assign. Awardees with a higher risk score are not considered to be poor-performing or “bad awardees”; however, the greater the number of identified risks, the more likely an awardee will be selected for monitoring.

In addition, OM hopes to increase the frequency of monitoring for all awardees, which may be conducted virtually or on-site. AmeriCorps no longer uses the number of years since the last monitoring visit as a measure for determining monitoring selections (i.e., six years since last monitoring visit). On-site visits will not take place more than once per year for an awardee, unless more frequent monitoring is implemented as part of corrective action planning.

**Q: With the new monitoring process, awardees may be monitored more frequently than they have been in the past – how will AmeriCorps include enough time for awardees/commissions to incorporate corrective action/improvements before being selected for monitoring again?**

A: Approved corrective actions should be implemented and completed within one year of the conclusion of monitoring activity. If you are selected for monitoring and have a previously implemented or active corrective action plan, OM will use the monitoring opportunity to evaluate the impact of the improvements you adopted. It is not likely a grant recipient will be selected for a monitoring activity within the same year, unless complex compliance issues require more frequent, issue-based assessments.



**Q: What is the role/impact of an organization's financial compliance audit and Single Audit report on the AmeriCorps monitoring process?**

A: An organization's financial audit and Single Audit reports play a critical role in many elements of the AmeriCorps grantmaking and oversight process. AmeriCorps uses this information as part of pre-award decision-making, to inform the grant portfolio risk assessment, and for Monitoring Officers to review during research and preparation for assigned monitoring activities.

**Q: Is monitoring the same as IPERIA?**

A: No; the Improper Payments Elimination and Recovery Improvement Act (IPERIA) is limited to specific cost transactions. As a federal agency, AmeriCorps has met certain federally determined thresholds that require AmeriCorps to conduct IPERIA testing. IPERIA testing is conducted by our Office of the Chief Risk Officer (OCRO). OCRO shares IPERIA activities and results with OM, as it helps inform awardee risk levels and the selection of grants OM may monitor.

**Q: Is the Office of Monitoring the same as the Office of Inspector General (OIG)?**

A: No; the Office of the Inspector General (OIG) is an independent office within AmeriCorps that provides oversight of the agency's programs and operations to protect the integrity of national service. OM independently monitors the AmeriCorps grant portfolio for compliance with federal regulations and program policy. If fraud, waste or abuse is found during monitoring, OM will report this to the AmeriCorps OIG.

**Q: How does OM coordinate with the AmeriCorps Audit and Debt Resolution team and how do your activities overlap?**

A: The Office of Audit and Debt Resolution (OADR) manages the resolution and tracking of matters related to single audits and debt. OADR also leads the agency's indirect cost rate negotiation and policy efforts. These activities do not overlap with the main functions of OM. However, both units actively coordinate to ensure



information related to awardee compliance and performance is available to monitoring officials. This information can inform the grant portfolio risk assessment.

**Q: When you select a grant for monitoring, does it include all subrecipients?**

A: When a grant is selected for monitoring activities, OM will identify whether or not to assign a subrecipient oversight monitoring activity. This monitoring activity focuses on the prime awardee's policies and practices for performing subrecipient oversight and monitoring. The activity includes an evaluation of subrecipient monitoring activities for a selected sample of subrecipients for your grant. Documentation and interview requests from subrecipients may be part of the monitoring activity, as these provide evidence to OM about how well the awardee is overseeing its subrecipients. However, our office will not contact subrecipients directly without a prime awardee's knowledge. We will ask you to coordinate our activities related to subrecipients. Any subrecipient noncompliance will be reported to you for resolution.

**Q: Why is there such a big focus on prohibited activities when audits and investigations often show other issues are more problematic?**

A: Our framework for assessing grant compliance addresses both programmatic and financial elements of a grant and is based on Uniform Guidance and program regulations and policies. Prohibited activities pose a level of risk to AmeriCorps that warrants the assignment of a specific monitoring activity. Risk is a function of both the likelihood of an adverse event occurring—i.e., a Member or volunteer performing a prohibited activity—and the consequences of the event should it occur.

**Q: What does the timeline between being notified of a request for monitoring and the conclusion of monitoring look like?**

A: As OM continues to implement our new monitoring framework, timeframes for each phase of the monitoring activities are being evaluated. Our goal is that awardees will be clearly informed of when to expect monitoring results. Ultimately,



we intend to complete monitoring activities within a 90-day period; however, the completion of additional monitoring cycles will inform us if this goal can be achieved.

**Q: Will the Monitoring Officer and/or the awardee's Portfolio Manager (PM) oversee the implementation of the Corrective Action Plan (CAP)?**

A: The Monitoring Officer assigned to the grant will oversee an awardee's development of the CAP and the awardee's progress toward implementing corrective measures. PMs are informed of plans for OM to monitor awardees, the monitoring results, and the approved CAP so that they are aware of the areas of improvement identified for awardees.

**Q: Will OM share common findings after the first round of monitoring is finished?**

A: Once the first cycle of monitoring concludes, OM will provide high-level observations to awardees. However, OM must complete additional rounds of monitoring prior to identifying common trends and findings. The first monitoring round includes a smaller body of awardees than we anticipate will be included in the future. Once additional monitoring rounds are completed, OM intends to examine longitudinal results from monitoring activities and share observations with awardees related to monitoring trends and common findings. The continued collection of monitoring data over time will support this goal of sharing results related to monitoring trends and common findings in the future.

**Q: Will there be an opportunity for awardees who did not participate in the first round of monitoring to review and give feedback on OM's tools and processes?**

A: OM encourages ongoing feedback on the monitoring experience, which can be sent to [monitoring@cns.gov](mailto:monitoring@cns.gov). Awardees participating in the inaugural monitoring activities have first-hand experience with the new tools and process and will be asked by OM to provide feedback upon completion of their assigned monitoring activities. In addition, OM will review its policies, procedures, and tools related to monitoring on an annual basis.