SERVE WISCONSIN AMERICORPS PROGRAM DIRECTOR HANDBOOK

Last Updated: 2/5/2018

Please notify Serve Wisconsin staff right away if you find any broken links or other issues. This manual is provided as a helpful resource to grantees; however, it does not relieve the grantees of their responsibility to operate within the AmeriCorps regulations, guidelines, and grant Terms and Conditions. See section 1.5. Purpose of This Manual

Tip: To quickly find references to a certain topic, click "Ctrl" + "F" and type in keywords to search the entire handbook.

Serve Wisconsin AmeriCorps Program Director Handbook

Contents

1.1. Welcome to AmeriCorps and Serve Wisconsin 11

1.2. Summary of Changes 12

1.3. Introduction to AmeriCorps 13

1.4. Corporation for National and Community Service Strategic Plan 14

1.5. Purpose of This Manual 16

2.1. Wisconsin National and Community Service Board (Serve Wisconsin) 19

A. 2016-2018 Wisconsin State Service Plan 19

2.2. State Commissions and CNCS 20

A. America's Service Commissions (ASC) – The Voice for State Service Commissions 20

3.1. Program Technical Assistance and Training Overview 22

3.2. Technical Assistance & Training for WI AmeriCorps Programs 23

A. Technical Assistance 23

B. Training 25

C. Serve Wisconsin Sponsored Training and Event Reimbursement 26

D. Non-Attendance, Late Registrations and Non-Registered 26

E. Request Additional Assistance 26

3.3. Communication with Commission Staff 27

A. Alternate Contact 27

B. Program Director & Authorized Agency Staff 27

3.4. AmeriCorps Program Director Core Competencies 28

3.5. AmeriCorps Program Director Checklist 39

A. Effective Grant and Program Management 39

B. Member Human Resources 42

C. Member Support 45

D. Fiscal Oversight & Management 46

3.6. Program Director Training and Technical Assistance Request Form 48

4.1. Program Identification (Terms and Conditions) 50

A. AmeriCorps Logo (Terms and Conditions - Specific III.B) 50

B. Member Service Gear (AmeriCorps*State Agreement Addendum #1) 50
C. Service Site Signage 51
D. Media Inquiries 51
E. Member Public Outreach Activities 51
4.2. Site Management (Terms and Conditions) 52
A. Written Site Agreement 52
B. Site Selection (45 CFR §2522.450 and 45 CFR §2522.475) 52
C. Host Site Monitoring 52
4.3. Performance Measures & Progress Reports (45 CFR 2522.530- 45 CFR 2522.650) 53
A. OnCorps Grantee Progress Report (GPR) 53
B. Volunteer Mobilization Report 53
C. Member Reflections 54
D. Modifications to Approved Performance Measures 54
4.4. Evaluation (45 CFR 2522.500-540 and 45 CFR 2522.700-810; Annual NOFO/RFP) 55
A. Requirements 55
B. Reporting on Evaluation 55
C. Program Evaluation Cycles 56
4.5. Disaster Preparedness and Response 57
A. Extension of member term for disaster purposes 45 CFR 2522.220(f) 57
4.6. Members Serving as Reading Tutors/Requirements for Tutoring Programs (45 CFR 2522.900-950) 58
A. Tutoring Member Requirements 58
B. Tutoring Program Requirements 58
4.7. AmeriCorps Days of Service 59
A. National Days of Service (Agreement Addendum #1) 59
B. Reporting Days of Service 59
5.1. Eligibility, Selection, and Enrollment of Members (45 CFR 2522.200- 45 CFR 2522.210) 63
A. Eligibility [Terms and Conditions - Specific IX.B and 45 CFR 2522.200] 63
B. Term Limits & Education Award Eligibility [45 CFR 2522.235] 63
C. Minimum Qualifications 63
D. Members without a High School Diploma or GED 64
E. Process to Enroll Members 64
F. Enrollment Documentation 65

G. Enrollment Period 65

H. Reasonable Accommodations and Disability Inclusion [Terms and Conditions - Specific IV.C. and 45 CFR 2522.100(h)] 66

5.2. National Service Criminal History Checks (Regulations 45 CFR 2510, 2522, 2540, 2551 and 2552; Regulations published on October 5, 2012) 68

A. National Sex Offender Public Website Check 70

B. State Criminal Registry Check 71

C. Fingerprint-based FBI Criminal History Record Check 72

D. Wisconsin Circuit Court Access Check 73

E. Approval of Alternative Search Procedure 74

F. Supervision of Member While Results are Pending, Accompaniment 74

G. Checks for Re-Enrolling Members 77

H. Consideration of Criminal History Findings and Member/Staff Acknowledgment 77

I. National Service Criminal History Check Documentation 77

J. Costs Incurred Conducting Criminal History Checks 78

K. Financial Impact of Failure to Comply 78

L. National Service Criminal History Check Training (Terms and Conditions, NSCHC FAQs) 78

5.3. Program Design – Member Positions, Term Length & Activities (Terms and Conditions) 80

A. Member Position Design and Final Enrollment Dates 80

B. Modification of Program Design - Position Conversion 81

C. Calculating Conversions (Terms and Conditions - Specific VI.B and CNCS Policy FAQ) 81

D. Changing Member Term of Service (Terms and Conditions - Specific VI.C and CNCS Policy FAQ) 82

E. Unfilled Member Positions/Position Transfer 83

F. No-Cost Extensions (Grant Contract Article 5, Agreement Addendum #1, clause 14) 83

5.4. Exiting Members and Refilling Positions (Terms and Conditions and 45 CFR 2522.230) 84

A. Member Exits – Education Award Status & Future Service (45 CFR § 2522.230) 84

B. Member Exit – Successful Completion 84

C. Member End Date 85

D. Early Termination for Compelling Personal Circumstances (AmeriCorps State and National Policy FAQs) 85

E. Early Termination for Cause 87

F. Documentation of Early (Cause and Compelling Personal Circumstance) Member Exit 87

G. CNCS Member Exit Survey 87
H. Confidentiality of Member Early Exit Rationale 88
I. CNCS Refill Conditions 88
J. Suspension of Ability to Refill by CNCS 88
K. Organizations Ineligible to Refill 88
5.5. Member Leave or Suspension (45 CFR 2522.230, 2540.220, and 2540.230) 89
A. Member Suspension Process (National Policy FAQs, AmeriCorps Terms and Conditions) 89
B. Family and Medical Leave 90
C. Disciplinary 90
D. Grievance 90
E. Compelling Personal Circumstances 91
F. No Hours Served in a Pay Period 91
5.6. Standards of Conduct & Member Disciplinary Policy (45 CFR 2540.310) 93
5.7. Member Benefits (NOFO/RFP, Terms and Conditions and 45 CFR 2522.240-45 CFR 2522.250) 94
A. Living Allowance (Terms and Conditions - Specific VIII.A, B, and 45 CFR 2522.240) 94
B. Workers' Compensation (Terms and Conditions - Specific VIII.C.4) 95
C. Unemployment Insurance 95
D. AmeriCorps Health Care Policy (Terms and Conditions -Specific VIII.D) 96
E. Childcare (Terms and Conditions and 45 CFR 2522.250) 98
F. Student Loan Deferment and Forbearance 99
G. Public Service Loan Forgiveness (PSLF) and Income-Based Repayment (IBR) 100
H. Segal AmeriCorps Education Award 100
5.8. Member Records (Terms and Conditions, 45 CFR 2522.820) 103
A. Confidential Member Information (Terms and Conditions - Specific IX.C) 106
B. Member Eligibility Documentation (Terms and Conditions - Specific IX.B and Regulations 45 CFR 2522.200) 106
C. Member Enrollments – Paper Forms and My AmeriCorps Portal/eGrants 109
D. Member Contracts & Position Descriptions (Terms and Conditions – Specific V.B) 109
E. Member Position Descriptions (Terms and Conditions – Specific V.A, B) 111
F. Grievance Policy (45 CFR 2540.230) 111
G. Member Benefits 112

H. Member and Staff Timekeeping (Terms and Conditions – Specific V.F, 2 CFR, & Office of Management and Budget Guidance) 112
I. Member Performance Evaluations (Terms and Conditions - Specific V.E, 45 CFR 2522.220[c], 45 CFR 2526.15) 115
J. Member Training 116
K. Member Exits – Paper Forms and My AmeriCorps Portal/eGrants 116
L. Disciplinary Actions 118
M. Suspensions or Early Exits/Terminations 118
5.9. Member Activities 119
A. Creating Compliant Position Descriptions (Terms and Conditions - Specific V.A) 119
B. Member Service Projects and Policies 119
C. Fundraising & Training 119
D. Prohibited Activities (Terms and Conditions - Specific V.C and 45 CFR 2520.65) 120
E. Additional Prohibited Activities (45 CFR 2520.40) 121
F. Teleservice (2017.01 ASN Interim Guidance - Teleservice) 121
5.10. Member Training (Terms and Conditions, 45 CFR 2520.50, and 2522.100) 123
A. Member Orientation [45 CFR 2522.100 (g)(2), and National Policy FAQs] 123
B. Required and Suggested Member Training 123
C. Site Specific Training 124
D. Training Collaboration and Providers 125
6.1. Grant & Financial Management Overview 128
6.2. Regulations & Requirements 129
A. Code of Federal Regulations 129
B. State and Local Regulations 131
C. Grant Terms and Conditions (Including the certifications and assurances that are agreed upon by the program at the time of application submission.) 131
D. Notice of Grant Award 131
E. Approved Grant Application and Budget 131
F. Request for Proposals (RFP) and Application Instructions 131
G. AmeriCorps Grant Agreement 131
H. The National and Community Service Act of 1990 as amended by the Serve America Act 132
I. Financial Management Resources 132

6.3. Financial Management 133
6.4. Policies and Procedures 135
A. Financial Systems Start-Up Checklist (Serve WI) 135
B. General Policies 136
C. Required AmeriCorps Policies 138
D. Travel 138
E. Member Living Allowance 138
F. AmeriCorps Staff Timekeeping 140
G. Contractual and Consultant Services 141
H. Internal Controls 141
I. Procurement and Purchasing 141
J. Record Retention and Destruction 141
K. Other Key Policies 142
6.5. Internal Controls 143
A. Budget Control Policies 143
B. Financial Management Systems 143
C. Administrative/Indirect Costs 144
6.6. Documenting Expenses 147
A. General Federal Requirements 147
B. In-Kind Resources 147
6.7. Program Match (45 CFR 2521.35- 45 CFR 2521.90 and CNCS Single Match FAQ) 149
A. Matching Levels 149
B. Matching Requirements (45 CFR 2543.23) Cost Sharing or Matching 150
6.8. Budgeting & Reporting 152
A. Grant Period (Terms and Conditions) 152
B. Budgeting 152
C. Budget Modification 152
D. Financial Reporting 153
E. Serve Wisconsin Financial Reporting Schedule 157
F. Direct and Indirect costs 158
G. Notice to Serve Wisconsin 159
6.9. Estimated Unexpended Funds Report 163

6.10. Fiscal Desk Review – Not Applicable to Fixed Amount Programs 164
6.11. Audit Requirements 165
6.12. Grant Closeout 166
7.1. Monitoring Overview 168
A. Ongoing Communications 168
B. Official Guidance Memos 168
C. Progress Reports 169
D. Financial Reports 169
7.2. Monitoring Types and Tools 170
A. Serve Wisconsin Monitoring Activities 170
B. Fiscal Monitoring Activities by DOA and External Auditor 172
7.3. Timeline for Use of Monitoring Tools 173
7.4. Official Monitoring Visits 174
A. Program Monitoring Timeline 174
B. Other Information 175
C. Significant Concerns Regarding Program Operation 175
D. Criminal Activity (including Waste, Fraud or Abuse) 176
8.1. Regulations, Terms and Conditions, and Other Grant Management 178
A. Web Links to Bookmark 178
8.2. Civil Rights and Equal Opportunity Requirements 179
A. Grant Program Civil Rights Policy 179
B. Direct Links to Policies and Guidelines 180
8.3. Serve Wisconsin Guidance Memos 181
8.4. Unemployment Insurance State Statutes 182
9.1. Using Basecamp to Access Program Resources 183

Chapter 1 – Introduction to AmeriCorps and CNCS

Table of Contents

1.1. Welcome to AmeriCorps and Serve Wisconsin 11

1.2. Summary of Changes 12

1.3. Introduction to AmeriCorps 13

1.4. Corporation for National and Community Service Strategic Plan 14

1.5. Purpose of This Manual 16

1.1. Welcome to AmeriCorps and Serve Wisconsin

Congratulations on being funded as a Wisconsin AmeriCorps*State Program! Funding for AmeriCorps programs is highly competitive, and your grant award is a testament to the value of your program.

The Wisconsin National and Community Service Board (WNCSB or "the Commission") was established January 28, 1994, by then-Governor Tommy Thompson "to encourage community service and volunteer participation as a means of community and state problem-solving; to promote and support voluntary citizen involvement in government and private programs throughout the state; to develop a long-term, comprehensive vision and plan for action for community service initiatives in Wisconsin; and to serve as the state's liaison to national and state organizations which support its mission." The Board was later codified under 1993 Wisconsin Act 437.

WNCSB promotes, trains, and allocates resources to programs that enrich lives and communities through service and volunteerism. Serve Wisconsin achieves this by investing in sustainable service solutions, including AmeriCorps.

AmeriCorps, created by the signing of the 1993 National and Community Service Trust Act, provides opportunities for over 80,000 Americans each year to serve their community through AmeriCorps State and National, VISTA, and the National Civilian Community Corps (NCCC). Since 1994, when the first class of AmeriCorps members completed their term of service, **more than 900,000 Americans have given over 1.2 billion hours of service through AmeriCorps.**

AmeriCorps members in Wisconsin serve in State and National projects, as well as in tribal communities. AmeriCorps State and National programs are open to U.S. Citizens, Nationals, or lawful permanent resident aliens age 17 and older. Members may serve in full- or part-time positions over a period of up to 12 months. Members support Wisconsin organizations that support the community through all six of the priority areas of the Corporation for National and Community Service (CNCS): disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families. Programs' activities include tutoring and mentoring disadvantage youth, fighting illiteracy, improving health services, building affordable housing, cleaning parks and streams, operating after school programming, building organizational capacity, and much more.

1.2. Summary of Changes

- Added page numbers
- Updated references in many places to make it more clear whether the source material for the section was the Terms and Conditions – Specific, the Terms and Conditions – General, or both
- Updated outdated links and corrected language in many places to convey the meaning more clearly
- 3.2.B..ii removed references to CNCS and made other updates now that ASC is hosting the regional conferences
- Updated language in section 4.4.B to more closely align with the text in CNCS's 2018 NOFO
- Removed the reference to Join Hands Day in section 4.7.A because no updated information regarding Join Hands Day was found
- Added and modified two links at the bottom of section 5.2.B to help programs find information related to the WI Department of Justice criminal history check system and where to start running checks
- Clarified in section 5.2.B and 5.2.C that Serve Wisconsin does not consider scheduling fingerprint appointments to be initiation
- Added language to section 5.2.F from the Enforcement Guide that requires programs to have policies and procedures that clearly describe their accompaniment guidelines and the compliant procedures for documenting accompaniment. Also added directions to show program directors how to make accompaniment required on timesheets in OnCorps
- Added detail to section 5.3.D to note what is required in eGrants for a filled member position conversion
- Updated the contact information for our representative at the National Service Trust in section 5.8.B.i

1.3. Introduction to AmeriCorps

AmeriCorps, which is funded by the Corporation for National and Community Service (CNCS), engages more than 80,000 individuals in intensive service each year through more than 15,000 nonprofits, schools, public agencies, and community and faith-based groups across the country. Members help communities tackle pressing problems while mobilizing millions of volunteers for the organizations they serve. They gain valuable professional, educational, and life benefits, and the experience has a lasting impact on the members and communities they serve.

AmeriCorps consists of three main programs: AmeriCorps State and National, whose members serve with national and local nonprofit and community groups; AmeriCorps VISTA, through which members serve full time fighting poverty; and AmeriCorps National Civilian Community Corps (NCCC), a team-based residential program for young adults 18-24 who carry out projects in public safety, the environment, youth development, and disaster relief and preparedness. CNCS also supports Senior Corps, which taps the skills, talents, and experience of more than 330,000 Americans aged 55 and older to meet a wide range of community challenges through three programs: RSVP, the Foster Grandparent Program, and the Senior Companion Program.

The bipartisan Edward M. Kennedy *Serve America Act* focused AmeriCorps' efforts in six key areas: disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families. To strengthen accountability, AmeriCorps programs are required to demonstrate their impact using standard performance measures.

AmeriCorps members make our communities safer, stronger, healthier, and improve the lives of tens of millions of our most vulnerable citizens. AmeriCorps' impacts are proven and measurable.

For more information about the history of National Service and AmeriCorps, please visit the Corporation's website.

1.4. Corporation for National and Community Service Strategic Plan

Established in 1993, the Corporation for National and Community Service (CNCS) is a federal agency that engages more than 5 million Americans in service through its core programs – Senior Corps and AmeriCorps. As the nation's largest grantmaker for service and volunteering, CNCS plays a critical role in strengthening America's nonprofit sector and addressing our nation's challenges through service.

CNCS harnesses America's most powerful resource – the energy and talents of our citizens – to solve problems. From grade school through retirement, CNCS empowers Americans and fosters a lifetime of service.

CNCS Mission and Guiding Principles

The mission of CNCS is to improve lives, strengthen communities, and foster civic engagement through service and volunteering.

CNCS is guided by the following principles:

- Put the needs of local communities first.
- Strengthen the public-private partnerships that underpin all of our programs.
- Use our programs to build stronger, more efficient, and more sustainable community networks capable of mobilizing volunteers to address local needs, including disaster preparedness and response.
- Measure and continually improve our programs' benefits to service beneficiaries, participants, community organizations, and our national culture of service.
- Build collaborations wherever possible across our programs and with other federal programs.
- Help rural and economically distressed communities obtain access to public and private resources.
- Support diverse organizations, including faith-based and other community organizations, minority colleges, and disability organizations.
- Use service-learning principles to put volunteer and service activities into an appropriate context that stimulates life-long civic engagement.
- Support continued civic engagement, leadership, and public service careers for our programs' participants and community volunteers.
- Exhibit excellence in management and customer service.

CNCS envisions an organization that is:

- A catalytic, coordinating, and creative force in realizing this vision for service in America.
- A valuable resource to—and a partner with—national, state, and local organizations that encourage community service and address community needs.
- Entrepreneurial, innovative, effective, and efficient in utilizing its resources, influence, and activities.
- A good steward of taxpayer dollars that operates programs in a cost-effective manner.
- An agency with a demonstrated history of nonpartisanship.

Management and organization

CNCS's Board of Directors and Chief Executive Officer are appointed by the President and confirmed by the Senate. The Chief Executive Officer oversees the agency, which includes about 600 employees operating throughout the United States and its territories.

- Executive Leadership
- Organizational chart
- CNCS state offices

The Board of Directors sets policies and direction for CNCS and is responsible for all actions taken by the Chief Executive Officer with respect to standards, policies, procedures, programs and initiatives as are necessary to carry out the mission of CNCS.

The AmeriCorps NCCC Advisory Board advises the director and staff on policy and programs; assists in developing a long-term strategy; facilitates the pooling of national, state, and local resources; reviews program progress and direction; and assists in evaluating the program.

1.5. Purpose of This Manual

As an AmeriCorps program funded through Serve Wisconsin, this manual serves to provide information on effective program management that has been gathered through consultation with the Corporation for National and Community Service (CNCS), the Office of the Inspector General, or other CNCS representatives. This manual does not replace the regulations, grant Terms and Conditions, application instructions or Notice of Funding Opportunity (NOFO) for the applicable grant year, as provided by CNCS. Many of these documents are incorporated by reference into the annual grant agreement. This manual is intended to assist grantees by providing relevant Corporation materials and applicable state guidelines in a centralized location that is easily searched. It will be updated annually, kept in an electronic format, and will be maintained on the Serve Wisconsin website. Any additions or amendments to the materials contained within this manual on an annual (or as needed) basis will be communicated to current grantees. This manual is provided as a helpful resource to grantees; however, it does not relieve the grantees of their responsibility to operate within the regulations, guidelines, and Terms and Conditions mentioned above.

It is recommended that Program Directors seeking guidance first refer to the Terms and Conditions and then read any relevant information from this manual. Individuals with questions or concerns should consult the National and Community Service Act of 1990 ("Act") (42 U.S.C.A. § 12501 et. seq.), the regulations issued under the act (45 CFR § 2500.1 et. seq.), the Edward M. Kennedy Serve America Act, the most recent AmeriCorps Grant Terms and Conditions, the AmeriCorps Application Instructions, NOFO and/or relevant state law. (Detailed Corporation regulations, Terms and Conditions, guidelines, and statutes can be found at http://www.nationalservice.gov/build-your-capacity/grants/managing-americorps-grants.) AmeriCorps programs and members are eligible to utilize the Commission's appeals process as described within these documents.

If there is a conflict between the contents of this manual and the federal guidance referenced above, the federal Terms and Conditions, regulations, etc. are the controlling authority. Still, AmeriCorps Program Directors should familiarize themselves with the information contained within this manual and are responsible for using the manual and related documents to obtain information necessary for the day-to-day operation of their programs. AmeriCorps Programs (also referred to as "grantees") are responsible for operating in accordance with the AmeriCorps Terms and Conditions, applicable federal statutes, regulations and guidelines and any amendments thereto. In addition, grantees are expected to operate their program in accordance with the grant application, budget and supporting documentation approved by the Corporation. The grantees are also responsible for assuring that all project sites and grant-supported activities are in compliance with applicable federal requirements.

The grantee has full fiscal and programmatic responsibility for managing all aspects of the grant and grant-supported activities, subject to the oversight of Serve Wisconsin. The grantee is accountable to the Serve Wisconsin for its operation of their AmeriCorps Program and the use of Corporation grant funds. It must expend grant funds in a judicious and reasonable manner. Although grantees are

encouraged to seek the advice and opinion of Serve Wisconsin on special problems that may arise, such advice does not diminish the grantee's responsibility for operating decisions.

All Wisconsin AmeriCorps*State Programs (competitive, formula, education award, etc.) receive federal funds as grantees of the Commission. Therefore, the Commission must ensure that grantees operating under this award comply with assurances and certifications, Terms and Conditions, regulations and U.S. Office of Management and Budget (OMB) circular incorporated into the application process or by reference with the final grant agreement. The Commission executes a grant agreement with each grantee on an annual basis. This agreement details the relationship between the Commission and the grantee/program as it relates to the AmeriCorps grant. Grantees are expected to adhere to the obligations described within the grant agreement, which comply with federal and state regulations at the time of issuance.

Any exceptions to policies detailed within this document must be approved in writing by the Commission. Copies of written exceptions must be maintained by the program with their grant agreement. Policy exceptions should be requested through the program's Serve Wisconsin Program Officer as far in advance as possible.

If you notice any broken links, outdated information, inconsistencies, or other errors, please contact a Serve Wisconsin Program Officer right away so that we are able to make the correction.

Chapter 2 – Wisconsin State Service Commission

Contents

2.1. Wisconsin National and Community Service Board (Serve Wisconsin) 19

A. 2016-2018 Wisconsin State Service Plan 19

2.2. State Commissions and CNCS 20

A. America's Service Commissions (ASC) – The Voice for State Service Commissions 20

2.1. Wisconsin National and Community Service Board (Serve Wisconsin)

The Wisconsin National and Community Service Board (WNCSB or Serve Wisconsin) was established January 28, 1994, by then-Governor Tommy Thompson "to encourage community service and volunteer participation as a means of community and state problem-solving; to promote and support voluntary citizen involvement in government and private programs throughout the state; to develop a long-term, comprehensive vision and plan for action for community service initiatives in Wisconsin; and to serve as the state's liaison to national and state organizations which support its mission." The Board was later codified under 1993 Wisconsin Act 437.

WNCSB promotes, trains, and allocates resources to programs that enrich lives and communities through service and volunteerism. Serve Wisconsin achieves this by investing in sustainable service solutions, including AmeriCorps.

A. 2016-2018 Wisconsin State Service Plan

As stated in the 1990 Serve America Act (Section 178(e)), each State Service Commission must prepare a national service plan for their state that covers a three-year period, developed through an open and public process that includes measurable goals and outcomes for the state's national service programs and is updated annually. It must also ensure outreach to diverse community-based agencies that serve underrepresented populations; provide for effective coordination of funding applications submitted by the state; ensure outreach to, and coordination with, municipalities and county governments; and contain information that the State Commission considers to be appropriate.

2.2. State Commissions and CNCS

State Service Commissions, such as Serve Wisconsin, are vital links in the chain that translates national service dollars and initiatives into local results. All 50 States, plus the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands are represented by a State Service Commission. These governor-appointed commissions date back to the creation of the Corporation for National and Community Service with the passage of the National and Community Service Trust Act of 1993. State Service Commissions annually manage more than $250 million in federal national service grants, along with more than $100 million from local sources, to make citizen service a reality. Not only that, but they also serve as watchdogs to ensure that these funds are used effectively.

Those serving on the commissions power the engines of national service. More than 1,110 private citizens serve as commissioners to drive the nation's philanthropic movement at public agencies or nonprofit organizations. State commissioners act as visionaries for service for governors, setting priorities for service and volunteerism, catalysts and ambassadors for service, creators of sustainable infrastructure for service and volunteerism, and developers of resources for the state.

In addition to overseeing the annual grant competition that awards funding to AmeriCorps State and other community service programs, State Service Commissions determine social needs in their states, set policy and program priorities, provide training and assistance, support national days of service, and promote service and volunteering. These organizations initiate activities that strengthen the role of service and volunteering to meet critical community needs across the nation in areas including literacy, environmental stewardship, housing, social services, and disaster relief.

State Service Commissions provide the connection in a state-federal partnership that maximizes the power of citizens to solve problems and strengthen communities.

A. America's Service Commissions (ASC) – The Voice for State Service Commissions

The American Association of State Service Commissions (ASC) is a nonpartisan, nonprofit organization representing and promoting state service commissions across the United States. ASC is a peer network of governor-appointed commissioners and staff of the State Commissions committed to working on national representation and advocacy of national service and volunteerism, and peer-to-peer support. Through this network, voluntary service, in all its forms, is strengthened and enhanced by mobilizing the expertise of these individuals to represent all streams of national and community service.

Chapter 3 – Program Training, Technical Assistance & Core Competencies

Contents

3.1. Program Technical Assistance and Training Overview 22

3.2. Technical Assistance & Training for WI AmeriCorps Programs 23

A. Technical Assistance 23

B. Training 25

C. Serve Wisconsin Sponsored Training and Event Reimbursement 26

D. Non-Attendance, Late Registrations and Non-Registered 26

E. Request Additional Assistance 26

3.3. Communication with Commission Staff 27

A. Alternate Contact 27

B. Program Director & Authorized Agency Staff 27

3.4. AmeriCorps Program Director Core Competencies 28

3.5. AmeriCorps Program Director Checklist 39

A. Effective Grant and Program Management 39

B. Member Human Resources 42

C. Member Support 45

D. Fiscal Oversight & Management 46

3.6. Program Director Training and Technical Assistance Request Form 48

3.1. Program Technical Assistance and Training Overview

Serve Wisconsin utilizes a program development system that includes training, technical assistance and support to strengthen program operations and to ensure high quality programming targeted at addressing Wisconsin's needs. This is coupled with a thorough monitoring system designed to identify opportunities for continuous improvement and to ensure compliance with federal and state requirements.

Program management and program accomplishments are major factors of consideration for continued grant funding. These factors will have a significant weight when considered by Serve Wisconsin and CNCS related to ongoing program funding. Commission staff provides regular reports to the Corporation related to program successes and challenges. As necessary, Serve Wisconsin will bring significant compliance issues to the attention of the organization's Authorized Representative or other leadership. It should be noted that the Corporation and its contracted associates (auditors, monitors, etc.) will collect monitoring information from Serve Wisconsin to use in determining sites they will visit during their monitoring of Serve Wisconsin.

3.2. Technical Assistance & Training for WI AmeriCorps Programs

In order to offer program support and ensure compliance with regulations, Serve Wisconsin will provide training, technical assistance and support, coupled with a thorough monitoring process, designed to detect and correct compliance issues.

Serve Wisconsin staff is open to training and technical assistance suggestions from AmeriCorps program staff, including, but not limited to, quarterly progress reporting in OnCorps, annual program monitoring, and training evaluations conducted following every Serve Wisconsin training event. Based on input provided, Serve Wisconsin will conduct trainings for AmeriCorps Program staff and other National Service Program staff (as allowable by CNCS) throughout the year as funding allows.

A. Technical Assistance

i. AmeriCorps State Program Handbook

Programs are encouraged to familiarize themselves with and reference the CNCS Terms and Conditions, regulations and guidance related to operation of the AmeriCorps programs. These governing documents are referenced in this handbook and incorporated by reference into your AmeriCorps Grant Agreement. NOTE: for the most up-to-date forms and resources please visit the Serve Wisconsin Basecamp page.

ii. Serve Wisconsin Email Distribution List

Serve Wisconsin staff strives to keep programs updated on important policy and program developments, provide reminders of important dates, and share other important information. In support of these goals, Serve Wisconsin communicates through regular emails. Important and often timely information about CNCS and Serve Wisconsin policy changes, information from CNCS, requests for program input, reminders and registration information for upcoming trainings, due dates for reports and forms, etc. is communicated through Serve Wisconsin's email distribution list. It is critical that Program Directors review all information provided in important emails and share the information with other relevant individuals (members, site supervisors, financial personnel, etc.). Please keep Serve Wisconsin informed of any changes in contact information.

All updates that are relevant to the group will be posted to Basecamp. Ones that are of higher importance will also be emailed out to Program Directors using the servewisconsin@wisconsin.gov email address in addition to being posted to Basecamp.

iii. Monthly Calls

In order to recap some of the more recent communications coming from our office and highlight upcoming dates of importance, Serve Wisconsin staff hosts monthly update calls for AmeriCorps program staff. These calls are scheduled to occur the first Wednesday of every month at 1pm. To participate, please go to the Basecamp Calendar to find the call details.

iv. Serve Wisconsin Newsletter

The newsletter contains important and often timely information about Serve Wisconsin program happenings, special events, as well as reminders and registration information for upcoming trainings, due dates for reports and forms, etc.

v. Basecamp

Serve Wisconsin utilizes Basecamp as an online community for AmeriCorps program staff. Messages posted to Basecamp often contain important and timely information about CNCS and Serve Wisconsin policy changes, information from CNCS, requests for program input, reminders and registration information for upcoming trainings, due dates for reports and forms, etc. At any time, those with access to the Serve Wisconsin Basecamp team can view the current members of the group to ensure that all program staff they wish to be part of the community indeed has been granted access. Basecamp is also the home of a resource library that Serve Wisconsin maintains. Programs are encouraged to refer to the resources stored there, as many answers to questions are stored there.

vi. Staff

Serve Wisconsin Program Officers are available to offer technical assistance to programs.

a. Informal

Program Directors may contact staff at any time with questions or concerns regarding effective operation of the AmeriCorps program, however, Program Directors have the ultimate responsibility for knowledge of and adherence to AmeriCorps policies established by the federal government and by Serve Wisconsin.

b. Consultation/Technical Assistance Session

If a significant amount of time is required to respond to a program inquiry, Commission staff will request that Program Directors (or other staff) schedule an appointment.

vii. On-Site/Participatory

In some cases, on-site assistance is more beneficial, and programs are encouraged to request on-site assistance if needed. In addition, training and technical assistance opportunities are sometimes available at the national level through the Corporation.

viii. Program Director Association

Serve Wisconsin Program Directors are encouraged to use fellow Program Directors as resources. When concerns and challenges regarding the day-to-day operations of AmeriCorps programs arises, reaching out to other program directors who have gone through those same challenges can be extremely helpful. Often times peer support can be the best method for developing new strategies and gaining ideas for improving individual programs. The Serve Wisconsin Basecamp site is designed to be used in part as a forum for discussing general challenges and sharing ideas. Basecamp should not be used to share personal information and information regarding a member or program staff should be kept anonymous.

B. Training

Serve Wisconsin staff works to provide relevant, timely, and practical training to staff and members of AmeriCorps programs (in some cases, trainings are open to members of other national service programs, depending on federal regulations guiding the use of funds).

Staff and members are encouraged to take advantage of these opportunities to strengthen their program and make continuous improvements. In some cases, attendance is mandatory for Program Directors, so please mindful of this when reading through announcements. AmeriCorps program staff's attendance and participation in Serve Wisconsin sponsored trainings is often recorded and will be a factor for consideration in evaluation during program monitoring and future funding requests.

i. Program Director Training

A schedule of training events will be provided to the AmeriCorps Programs as far in advance as possible. For required Program Director trainings, each program *must* be represented by the Program Director or other appropriate representative (an AmeriCorps member is not an appropriate representative for these meetings).

a. New Program Director Orientation

Serve Wisconsin will provide an orientation/training for new Program Directors (those with less than two (2) years of program director experience) to provide them with training on program and grant management and give them an opportunity to share best practices. So long as funding allows, this will be provided on an annual basis. In the past these trainings have occurred at the end of summer.

b. Program Director Meetings

Serve Wisconsin will conduct yearly meeting(s) with AmeriCorps program staff. These meetings are intended to keep Program Directors informed of current issues and provide on-going technical assistance and training. It is expected that each Program Director will attend a meeting each year. If a conflict arises on occasion, the Program Director will assign another staff person (not a member) to attend the meeting and notify their Serve Wisconsin Program Officer of the substitution. Attendance and participation in the meetings will be a factor for consideration in evaluation during program monitoring and future funding requests. Failure to participate in Serve Wisconsin meetings can result in additional programmatic reporting to verify that the program has the information they need to effectively manage their AmeriCorps grant.

c. Additional Trainings/Meetings

Typically Serve Wisconsin has offered additional trainings/meetings based on the information from Serve Wisconsin Staff monitoring and issuance of new or revised federal regulations or other guidance. Serve Wisconsin staff will keep programs updated on the status of future training.

ii. Regional National Service Trainings

Commissions in the North Central region of the US, in conjunction with ASC will provide regional trainings for all State Commission staff and AmeriCorps program staff. ASC intends for these conferences to build on and leverage previous investments to increase the capacity for national service resources to impact communities. The regional training offers workshops on topics including grants management, budget management, financial monitoring, performance measurement, national service criminal history checks and many other topics to support program and fiscal staff in the effective management of national service grants.

iii. Site Supervisor Training

When relevant, Serve Wisconsin welcomes the participation of site supervisors in trainings. Serve Wisconsin staff strives to ensure that training is useful to attendees and will make specific reference to trainings that are open to site supervisors. Programs are responsible for the training of their host site supervisors and other staff.

iv. Member Training & Service Events

The grantee agrees, within reasonable limits, to arrange for members to participate in AmeriCorps events and activities sponsored by Serve Wisconsin and the Corporation, such as relevant regional and statewide conferences, trainings and various service activities.

Member events sponsored by Serve Wisconsin are excellent opportunities for member development. Attendance should be encouraged and members should be permitted the time away from their site to attend Serve Wisconsin sponsored events.

C. Serve Wisconsin Sponsored Training and Event Reimbursement

Serve Wisconsin is committed to providing quality trainings to programs. Serve Wisconsin sponsored trainings and events that require the attendance of grantees will be communicated as soon as information is available. Serve Wisconsin requires that all grantees budget a minimum of $2,000 each grant year to support travel for program staff to attend CNCS-sponsored training.

D. Non-Attendance, Late Registrations and Non-Registered

Serve Wisconsin reserves the right to request reimbursement from programs for any costs resulting from late registrations, non-attendance by registered participants or other actions by person's associated with the program's members or staff. *All costs relative to these requests for reimbursement must be paid from non-federal sources.*

E. Request Additional Assistance

Questions and requests for specific technical assistance should be addressed to your assigned Serve Wisconsin Program Officer.

3.3. Communication with Commission Staff

Periodically, Commission staff will contact program staff for information or input. Program Directors must make every effort to respond to these requests in a timely manner. Towards this end, if you will be out of the office for a significant period of time, we expect you to keep email and voice mail messages up-to-date so that we can be aware of absences. Particularly with Corporation deadlines, there may be occasion for us to contact Program Directors with an immediate need and information on absences is very helpful. Serve Wisconsin staff will also make every effort to inform programs of significant absences and to keep our phone and email messages updated to avoid delays in responding to program inquiries.

A. Alternate Contact

It is recommended that Program Directors designate another staff person at the grantee agency who will serve as the alternate contact for the AmeriCorps program when the Program Director is absent or unavailable. The alternate contact could serve as the Program Director's designee on Program Director conference calls and should also have enough familiarity with the program to make time-sensitive decisions when the Program Director cannot be reached.

B. Program Director & Authorized Agency Staff

In general, communications related to day-to-day operation of the AmeriCorps program will go to the designated Program Director. Notices regarding grant awards/amendments, or serious concerns about programmatic or financial management will go to the authorized agency representative. Programs with multiple staff working on the AmeriCorps program must provide clearly designated staff roles and contact information for various operations. Serve Wisconsin staff will not be responsible for deciding who receives what information.

3.4. AmeriCorps Program Director Core Competencies

These core competencies are intended to provide Serve Wisconsin's AmeriCorps programs and prospective applicant organizations with an overview of the competencies needed for effective AmeriCorps program management. A competency is a combination of knowledge, skills and abilities that are required to perform a task. Competencies described here are all important and interrelated. Managing a program and grant effectively requires proficiencies in all of the core competencies.

	COMPETENCY	PROGRAM DIRECTORS WORKING WITH AMERICORPS PROGRAMS WILL POSSESS THE ABILITY TO…
Effective Grant and Program Management	**Program Management**	Develop and maintain sound fiscal and organizational management systems and practices compliant with federal laws and regulations, CNCS requirements and Serve Wisconsin policies and procedures.
	Theory of Change and Continuous Improvement	Define and revise a Theory of Change for how the program activities will lead to long term results, including performance measures with outputs and outcomes; develop and utilize appropriate data collection instruments, analyze data gathered, report on the performance as demonstrated by the data, and utilize this data to make improvements to the program.
	Site Management	Develop strong partnerships with member service sites, supported by written agreements, intended to support overall program goals and quality member experiences. Ensure proper training and monitoring of sites and, where possible, incentivize strong site management through a competitive application process.
	Community Engagement & Strengthening	Work with individuals and organizations to identify community needs, leverage community assets, and position program or project as a strategy for solving community problems, ideally as part of a collective impact model.
Member Management	**Member Human Resources**	Utilize sound human resource and inclusion practices and principles to recruit, enroll and retain member positions as detailed in the approved grant. Provide members with written service agreements outlining program requirements. Ensure that member placements are developed based upon a program design that is reflective of community need and that member activities contribute to the program goals. Effectively recruit and retain a corps that represents the overall diversity of the community it serves.
	Member Support	Develop and conduct a comprehensive member training plan, designed to ensure that members receive the federal and state required trainings, and maintain appropriate documentation thereof. Work to ensure that members have the skills and training necessary to successfully carry out their specific service activities. Develop partnerships that enable well-rounded, high quality training inclusive of adult learning strategies.
Fiscal Oversight and Management	**Financial Management**	Actively participate in managing the budget of the program. Work cooperatively with financial and leadership staff to develop practices that effectively plan for and manage program funds and provide for accurate, complete and current disclosure and documentation of the financial status of the AmeriCorps program.
	Sustainability	Develop financial and non-financial support including, but not limited to, creating a sustainability plan, identifying potential sources of funds, developing funding and partnership proposals, presenting requests for assistance and securing adequate cash and in-kind match.
Leadership Development	**Professional Development**	Plan and participate in skill and knowledge-building educational opportunities that promote personal and professional growth. Opportunities should be related to issues that impact the program, broader community needs, evolving national priorities and the competencies outlined in this document.
	Leadership & Public Policy	Cultivate leaders and champions within AmeriCorps and the national service network. Maintain a working knowledge of federal and state legislation, national governing policy, and policy trends that affect the implementation of national service programs. Form positive relationships with local, state and federal elected officials for the purpose of informing legislators about the work of the AmeriCorps program.

Program Management	**Develop and maintain sound fiscal and organizational management systems and practices compliant with federal laws and regulations, CNCS requirements and Serve Wisconsin policies and procedures.**			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Programmatic Record Keeping	Annually revises and modifies record keeping process to adhere to CNCS and Serve Wisconsin policies and procedures.	Implements record keeping plan to maintain 100% compliance.	Creates a system for collecting, organizing and retaining records.	Limited knowledge of record keeping and retention policies.
Appropriate Program Activities	Monitors all program activities to ensure they are consistent with the approved grant application and adhere to CNCS Terms and Conditions and regulations and Serve Wisconsin policies and procedures.	Identifies area(s) of possible non-compliance and develops procedures to address these issues and ensure compliance.	Thoroughly understands approved grant application, CNCS Terms and Conditions and regulations and Serve Wisconsin policies and procedures.	Limited knowledge of approved grant application, CNCS Terms and Conditions and regulations and Serve Wisconsin policies and procedures.
Program Design	Implements and evaluates a program design model that supports the Theory of Change (TOC). All member activities are in alignment with the Program Design and include a strong evidence–base for the approach and member activities/intervention.	Member activities are consistently in support of the Program Design outlined in the approved grant application.	Choose either Strong or Struggling	Member activities vary widely based on the skills of the recruited member and/or of the site. Poor understanding of Program Design.
Understanding Federal & State Requirements	Strong understanding of federal and state requirements and their applications. Ability to identify and interpret federal policies governing effective program management.	Familiar with federal and state requirements. Ability to apply major requirements.	Ability to locate the relevant federal and state references in the Serve Wisconsin manual, federal regulations, Terms and Conditions, application instructions, etc.	Limited knowledge of federal and state requirements.
Communication	Maintains regular communication with Serve Wisconsin Program Officer regarding all facets of the program through regular reporting, appropriate notice and request for amendments, etc. Reads and responds to Serve Wisconsin communication on a regular and timely basis.	Provides updates to Serve Wisconsin of developments as required by CNCS and Serve Wisconsin. Communicates with Serve Wisconsin during regularly scheduled meetings/calls.	Provides updates, as needed, to Serve Wisconsin staff of critical developments. Responds to inquiries from Serve Wisconsin.	Limited communication with Serve Wisconsin staff. Lack of responsiveness to Serve Wisconsin inquiries and failure to respond/participate in Serve Wisconsin calls.

Theory of Change & Continuous Improvement	**Define and revise a Theory of Change for how the program activities will lead to long term results, including performance measures with outputs and outcomes; develop and utilize appropriate data collection instruments, analyze data gathered, report on the performance as demonstrated by the data, and utilize this data to make improvements to the program.**			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Theory of Change (TOC)	Thorough understanding of Theory of Change; well-developed TOC that identifies the need & has well-defined, evidence-based interventions targeted at the need. Supporting logic model measures impact of the intervention.	Has identified TOC, but individual components are not fully developed.	Logic model is developed, but supporting Theory of Change is not well-defined or is not well-supported by evidence.	Limited knowledge of TOC and lack of development of TOC model to support program.
Performance Measurement	Thorough understanding of outputs and intermediary/end outcomes; integrates a comprehensive timeline and strategies for gathering data and analyzing results in concert with other organizational evaluation efforts.	Thorough understanding of outputs, intermediary, & end outcomes; implements components of a comprehensive timeline; gathers data and analyzes results.	Explores strategies for measuring performance, has developed outputs and outcomes to measure program impact; develops a timeline to gather data and analyze results.	Limited knowledge of performance measures. Lack of timeline for data collection analysis. Inability to gather data and analyze results or collects data that does not meaningfully demonstrate program impact.
Data Collection Tools	Effectively uses a variety of validation instruments and methods to successfully measure program impact, annually reviews instruments and strategies to determine effectiveness.	Effectively uses a variety of validated instruments and methods that successfully measure program impact.	Identifies the instruments and strategies for measuring program data.	Limited knowledge of data collection instruments and methodology.
Evaluation	Effectively conducts and utilizes information from a 3-year evaluation designed to assess the program's Theory of Change to modify and improve the program.	Conducts a 3-year evaluation designed to assess a key program component. Information used to improve program.	Explores strategies and methodologies for conducting a program evaluation.	Limited knowledge of program evaluation. Lack of rigorous evaluation process or methods.
Data Dissemination	Effectively communicates relevant data with stakeholders through a variety of methods; obtains feedback from stakeholders to inform improvements in evaluation and dissemination efforts.	Effectively communicates relevant data with stakeholders through a variety of methods.	Identifies stakeholders and the relevant data appropriate for each audience.	Limited knowledge of the connection between evaluation and the importance of sharing impacts with stakeholders.
Continuous Improvement	Successfully seeks out and utilizes feedback and performance measure data to inform overall program improvement and innovation; systems and activities are modified accordingly.	Integrates feedback and evaluation information to inform overall program improvement and innovation.	Explores strategies for collecting feedback and program input; identifies timeline for implementing strategies.	Limited knowledge of feedback and evaluation information for program improvement.

Site Management	**Develop strong partnerships with member service sites, supported by written agreements, intended to support overall program goals and quality member experiences. Ensure proper training and monitoring of sites and, where possible, incentivize strong site management through a competitive application process.**			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Site Recruitment	Conducts regular review of portfolio of sites to ensure sites are addressing the needs identified within the Theory of Change (TOC). Competitive process is used to outreach, screen and select sites for member placements.	Sites are selected from pool of interested applicants. Limited opportunities for competition and selection of sites based on performance and alignment with TOC.	Same sites are utilized each year without regard for their effectiveness. No opportunities for new sites or competition among sites.	Failure to identify sites for all members. Selected sites do not meet obligations.
Site Development	Provides consistent communication, ongoing training and continuous guidance and support to program sites.	Implements strategy to monitor sites and provide continuous guidance and support.	Educates sites regarding program goals, member activities, CNCS and Serve Wisconsin requirements and policies.	Limited knowledge related to site management and development.
Site Management	Written document fully details the agreement between site and sponsor, including financial and supervisory obligations. Document is reviewed and revised annually.	Written document covers key components of the partnership for member placement and supervision.	Letter of agreement from sponsoring organization to host site, detailing the obligations of participation.	Lack of formal, written agreement. Poorly detailed written document.
Site Input	Utilize annual formal evaluation process to collect input from sites to improve program functionality. Use input to make changes that improve efficiency or effectiveness of program.	Conduct formal written process to collect input from sites on project successes and challenges.	Collect feedback informally from sites to hear their concerns and successes.	Failure to collect or utilize input from sites to improve program, activities or processes.
Site Supervisor Training	Provide regular training and technical assistance opportunities for site supervisors, designed to provide accurate information and respond to questions. Utilize written site supervisor manual to support effective site management.	Conduct at least annual site supervisor training. Offer opportunities for informal communication with site supervisors. Provide written guidance on key elements of site supervision.	Have “open door policy” for site supervisors to raise questions or request technical assistance.	Poor communication and lack of understanding of the importance of strong site supervision and management.
Site Monitoring	Conduct regular monitoring of all aspects of site management. Provide written reports and follow up on compliance and continuous improvement issues.	Conduct informal monitoring of sites. Follow-up with sites to correct compliance issues.	Provide informal feedback to sites when compliance issues are noted.	Failure to monitor sites or failure to address compliance or continuous improvement issues.

Community Engagement and Strengthening	**Work with individuals and organizations to identify community needs, leverage community assets, and position the program or project as a strategy for solving community problems, ideally as part of a collective impact model.**			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Collective Impact Model	Key partner in aligned cross-sector strategy designed to address the same goals and measuring the same impact through coordinated action and shared learning. Effort includes government, corporate and nonprofit sectors, with backbone organization and continuous communication.	Established collaborations that provide mutual benefits resulting in achievement of common goals; viewed as key resource by other organizations and community leaders.	Begins to do outreach and make connections in the community; joins existing networks and establishes relationships to position the program.	Limited knowledge of outreach and collaboration strategies; unaware of how to effectively position service as key community strategy.
Community Needs Assessment	Systematically collect data & put in place sustainable processes that enable active learning of current needs & course correcting as progress is tracked towards common goals.	Conducts needs assessments on a regular basis, reviews data/results and identifies trends.	Explores needs assessment strategies and identifies appropriate methods for different audiences.	Limited knowledge of needs assessment strategies and changing community issues.
Leveraging Community Assets	Successfully identifies and leverages community assets to strengthen programming and community connections. As part of a collective impact model, pursue prioritized areas for action in a coordinated way.	Work together with partners to establish common goals & shared measures, create a supporting infrastructure and begin the process of aligning organizations with shared goals and measures.	Understand the landscape of key players and the existing work underway; identify baseline data on problem to develop case for change and a governance structure that includes strong, credible champions.	Exploring strategies for identifying and leveraging community assets; identifies and begins utilization of strategies. Limited knowledge of community assets and leveraging.

Member Human Resources	**Utilize sound human resource and inclusion practices and principles to recruit, enroll and retain member positions as detailed in the approved grant. Provide members with written service agreements outlining program requirements. Ensure that member placements are developed based upon a program design that is reflective of community need and that member activities contribute to the program goals.**			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Member Recruitment	Utilizes effective strategies for recruiting and selecting appropriate members. Follows CNCS criminal history check requirements for members.	Effectively implements a plan for member recruitment. Follows CNCS criminal history check requirements.	Identifies effective strategies for member recruitment. Follows CNCS criminal history check requirements.	Limited knowledge of strategies pertaining to member recruitment.
Member Enrollment & Exit	Members are enrolled & exited in a timely fashion, with proper notice to Serve Wisconsin when necessary. Member eligibility requirements (citizenship, age, criminal history, etc.) always met and clearly documented in files.	Members enrolled & exited within deadlines. Proper notice is given to Serve WI. Member eligibility & other required documentation present in files.	Choose either Strong or Struggling	Member enrollment & exit requirements and documentation rules not met or clearly understood.
Member Retention	Utilizes effective strategies for retaining members for their entire term of service (start/end dates and service hours requirement).	Uses strategies designed to retain members.	Identifies effective strategies to retain members.	Limited knowledge of tactics and strategies pertaining to member retention.
Program Design & Member Positions	Ensures member placements are aligned with the program's Theory of Change (including dosage, activities, intervention, etc.). Very few to no member position conversion requests.	Makes limited modifications to program design (through approved position conversions). Changes to member placements are consistent with TOC.	Makes numerous modifications to program design and requests approval.	Member placements based on member preferences and availability, rather than community need.
Member Service Agreement & Position Description	Fully compliant position descriptions and service agreements accurately detail member activities that are in alignment with the TOC and approved grant award. Service agreements include required & suggested items.	Position descriptions and member activities document activities that support the approved grant. Service agreements meet requirements.	Position descriptions are well detailed. Knows where requirements for service agreements are listed.	Failure to understand CNCS prohibited activities or other key requirements for member service. Service agreements and position descriptions out of compliance.
Member Support & Term Management	Monitor members' service progress. Ensure members have adequate time and activities to successfully complete their service. Work to proactively ensure members have proper support at their member service sites.	Conduct monitoring of member service hours to ensure members are able to complete their service hours. Address supervisory issues as necessary.	Works with member who identifies likely challenges with completing term to ensure service hour requirements are met. Members are informed about how to report problems w/ supervisors.	Failure to monitor member hours or adequately address failures from the site to support the members in completing their hours.
Member Human Resource Management	Effectively utilize service agreement to support strong member human resource management practices. Follow disciplinary procedures and implement regular evaluation process to provide feedback.	Follows disciplinary procedures as outlined in member service agreement and conducts regular evaluation of members, in partnership with site supervisors.	Conducts regular evaluation of members, in partnership with site supervisors.	Limited knowledge of effective member human resource practices and lack of awareness of role of member service agreement.

Member Support	**Develop and conduct a comprehensive member training plan, designed to ensure that members receive the federal and state required trainings and maintain appropriate documentation thereof. Work to ensure that members have the skills and training necessary to successfully carry out their specific service activities. Develop partnerships that enable well-rounded, high quality training inclusive of adult learning strategies.**			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Member Training Plan	Implements training plan that encompasses required trainings, provides site-specific skills and offers relevant professional development.	Provides training that meets the CNCS and Serve Wisconsin requirements. Members receive site-specific training.	Provides basic training to fulfill requirements.	Failure to provide required trainings. Lack of awareness of training requirements.
Member Development	Provides members with a well-rounded service experience, including leadership, skill-building and networking opportunities.	Provides selected members with opportunities for leadership, skill-building and networking.	Upon request, opportunities for leadership, skill-building and networking are available.	Members not encouraged with expanded opportunity in the areas of skill building, leadership and networking.
Team Development	Effectively integrates teambuilding strategies into program training activities to foster team cohesiveness; anticipates and addresses the stages of member development.	Implements teambuilding strategies to foster team cohesiveness; appropriately responds to member issues as they arise.	Recognizes team dynamics and emerging patterns of behavior; explores facilitation of activities to foster team cohesiveness.	Limited recognition of team dynamics; reactive.
Member Reflection	Leads reflective activities for members designed to deepen civic engagement and add meaning to the service experience.	Offers reflection materials that members may complete on their own.	Understands the strong benefits of reflection on member retention and satisfaction, working to develop reflection program.	Limited understanding and awareness of member reflection.
Effective Training Practices	Utilizes a variety of trainers with subject matter expertise to provide relevant and timely information presented using adult learning tactics.	Engages some outside presenters that are subject matter experts. Training is interactive and engaging.	Program director provides all training. Researching outside trainers to utilize.	Training covers the basic information, but is not engaging.
Continuous Improvement	Member feedback is actively sought following each training and throughout the year to improve training and member experience. Program utilizes input to develop new training topics, methods or trainers.	Member feedback is collected using a formal survey method following each training.	Member feedback is informally sought by the program director.	Feedback is not collected or considered to improve trainings.

Financial Management	Actively participate in managing the budget of the program. Work cooperatively with financial and leadership staff to develop practices that effectively plan for and manage program funds and provide for accurate, complete and current disclosure and documentation of the financial status of the AmeriCorps program. Adhere to the proposed budget, analyze and justify budget variances and monitor reports for accuracy.			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Accounting Knowledge	Strong understanding of budget and accounting terminology and their applications to the AmeriCorps program. Able to identify and interpret federal policies governing effective financial management	Sound understanding of fiscal management system, including fiscal and programmatic components, and monitoring.	Identifies all costs associated with the grant. Able to locate the relevant financial guidance, resources and references.	Limited knowledge of financial terminology or applications.
Budget Development	(Collaborates with program leadership to) develop and implement budget; designs budget to maximize resources in support of a fully compliant AmeriCorps project.	Identifies (to program leadership) priorities and mandates for AmeriCorps in order to accurately estimate spending and manage funds.	Aware of the program's approved budget. Approved budget includes all indirect and direct costs and Serve Wisconsin & CNCS required components.	Limited knowledge of or participation in budget development. Unable to identify Serve Wisconsin & CNCS budget requirements.
Manages Program Expenditures	In partnership with the fiscal officer, forecasts budget required to sustain program operations. Requests budget amendments in a timely manner.	Effectively manages program expenditures with fiscal officer, as applicable.	Aware of program expenditure amounts and claims process.	Lack of awareness of expenditures. Limited involvement with program expenditure management.
Monitoring Budget	In partnership with fiscal officer, reconciles budget and claims on a regular basis. Develops options for maximizing resources within federal requirements. Identifies variances and makes adjustments, as necessary.	Receives reconciliation report from the fiscal officer. Makes adjustments to remain within approved budget.	Reviews budget report. Limited communication with fiscal officer.	Limited ability to monitor and make adjustments to the budget.
Financial Reports	Reviews financial reports prior to submission. Understands financial reports and effectively communicates the information to other program officials and community partners.	Reviews financial reports to identify errors and variances from budget predictions.	Develops an understanding of financial reporting requirements.	Limited knowledge of financial reporting requirements.

Sustainability	Develop financial and non-financial support including, but not limited to, creating a sustainability plan, identifying potential sources of funds, developing funding and partnership proposals, presenting requests for assistance and securing adequate cash and in-kind match.			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Sustainability Plan	Successful integration of an overall sustainability plan with diversified resources and defined systems in place.	Implements a well-defined sustainability plan that is realistic and attainable within the identified timeline.	Defines basic elements that sustain the program, such as financial resources, program resources, and community support.	Limited knowledge or understanding of the value of a sustainability plan.
Programmatic Resource Identification	Successfully secures and utilizes a variety of program resources necessary for effective program management.	Identifies sources for obtaining and actively pursues programmatic resources.	Identifies the programmatic resources necessary for effective programming.	Limited knowledge of programmatic resources (training, materials, supplies, etc.).
Financial Resource Identification	Successfully leverages diversified funding (individually or in conjunction with other agency staff).	Actively pursues financial resources other than CNCS funds and host-site fees.	Identifies potential funding sources and develops a plan for requesting funds.	Limited knowledge of fund development practices.
Partnership Building and Collaboration	Successfully maintains relationships that are consistent and mutually beneficial.	Develops partnerships that foster mutual benefits.	Identifies potential partners and defines goals for collaborations.	Limited knowledge of partnership development.
Public Relations and Communications Strategy	Successfully utilizes a variety of communications strategies to increase public awareness and knowledge, resulting in community support.	Implements communications strategy, including outreach, social media and stakeholder education.	Identifies target audiences, develops appropriate messaging/branding and creates a communication strategy.	Lack of knowledge of marketing and public relations practices. No plan for communications about the program.
Volunteer Management	Community volunteers placed in leadership roles and completing activities targeted at meeting community need.	Community volunteers integrated and serving in long-term and/or key roles.	Community volunteers engaged in service days, one-time opportunities, or otherwise tangential roles.	Limited volunteer involvement. Role of volunteers in sustainability not understood.
Cultivation of Board & Leadership Support	Board and leadership understand the program and provide funding and support. Program has clear connection to mission and is seen as integral to achieving organizational goals.	Program has clear connection to organizational mission, but board/leadership has limited awareness of the AmeriCorps program.	Program is seen as an “add-on” and is not integrated into the organizational structure or limitedly connected to mission.	Program is not connected to mission and is not viewed as a priority by board or leadership.

Professional Development	Plan and participate in skill and knowledge-building educational opportunities that promote personal and professional growth. Opportunities should be related to issues that impact the program, broader community needs, evolving national priorities and the competencies outlined in this document.			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Personal and Professional Development Plan	Attends and leads trainings and researches best practices aligned with a professional development plan; effectively transfers skills to others; reviews plan annually to determine necessary revisions.	Attends trainings and researches best practices aligned with a professional development plan; seeks, accepts and utilizes feedback for growth and improvement.	Explores resources and training opportunities to build skill set; develops a professional development plan; asks for assistance as needed.	Limited knowledge of own personal and professional development needs and how to develop a plan to address needs.
Knowledge of National Service	Comprehensive knowledge of national service (i.e. streams of service, Terms and Conditions, regulations, guidance, program models, etc.); consistently applies knowledge to strengthen program. Seeks opportunities to connect with other national service programs.	Good working knowledge of national service. Familiar with various resources and can locate information related to effective program management. Aware of other national service programs doing related activities and/or in the same geographic area.	Explores national service and identifies future training needs. Asks questions when unsure of application of regulation or policy. Plans to outreach to other national service programs.	Limited knowledge of national service. Has not read or familiarized themselves with the guiding documents of national service. Unaware of other national service programs in the area or doing similar activities.
Serve Wisconsin Trainings	Regular and active participation by staff and members in Serve Wisconsin-sponsored training opportunities. Brings personal knowledge and shares information with others.	Some participation by staff and members in Serve Wisconsin-sponsored trainings and offers input on future training topics.	Choose either Strong or Struggling	Little or no participation by staff and members in Serve Wisconsin-sponsored training opportunities.
Disability Inclusion	Recognizes member performance issues related to undisclosed disability and provides appropriate resolution. Well versed in navigating disability benefits information as they relate to AmeriCorps benefits. All phase two items are routine.	Actively seeks opportunities to recruit persons with disabilities as members and partner with inclusive community organizations. Site Supervisors are trained regarding inclusivity. All phase one items are routine.	All members are offered reasonable accommodations and they are provided upon request. All sites are reviewed for accessibility.	Unfamiliar with inclusive requirements of grantees. Program issues related to disability are present.
CNCS-Sponsored Trainings & Resources	Active and regular participation in CNCS-sponsored trainings and review of CNCS resource materials. Applies personal knowledge and shares information with others.	Review and applies guidance from on-line materials available from CNCS-sponsored trainings and Resource Center.	Explores CNCS-sponsored trainings and resources.	Limited knowledge of CNCS trainings and resources.

Leadership and Public Policy	Cultivate leaders and champions within AmeriCorps and the national service network. Maintain a working knowledge of federal and state legislation, national governing policy, and policy trends that affect the implementation of national service programs. Form positive relationships with local, state and federal elected officials for the purpose of informing legislators about the work of the AmeriCorps program.			
QUALITY INDICATOR	**EXEMPLARY (PHASE III)**	**STRONG (PHASE II)**	**EMERGING (PHASE I)**	**STRUGGLING**
Best Practices	Identifies and utilizes evidence-based approaches and best practices from the field; documents best practices and shares with others. Serves as a leader/mentor to new programs.	Applies evidence-based approaches & best practices from the field. Begins to assess and document their program's best practices.	Explores & identifies best practices from the field and considers how these practices may be applied.	Limited knowledge of best practices and how to document and apply them.
Champion/ Leader Development	Successfully cultivates champions and other leaders who understand the value of national service and communicate this with others; evaluates identified champions / leaders on an on-going basis to assess the extent and quality of messaging.	Cultivates champions and leaders who understand the value of national service and communicate this with others.	Explores leadership development strategies and identifies potential champions/leaders to communicate the value of national service.	Limited knowledge of leadership development strategies and human resources available in the community.
Policy-Making Entities	Attends functions where policy information is shared; frequently reviews policy-making websites; shares relevant information with the national service network.	Attends functions where policy information is shared; regularly reviews policy-making websites.	Identifies and explores policy-making websites.	Limited knowledge of policy-making entities and the impact of policies on program and financial operations.
Contact with Wisconsin Legislators and Congress Members	At least yearly contact with Wisconsin elected officials to increase awareness and promote growth of volunteerism and service in Wisconsin; elected officials or staffers attend program events and projects; officials/staffers understand and can articulate program goals.	At least annual contact with Wisconsin Legislators and Congress members; invites elected officials to attend program events and projects; Elected officials become familiar with program goals and sponsoring organization.	Identifies the Wisconsin Legislator(s) and Congress members from their area and develops a plan to connect with them; invites elected officials (or staffers) to attend program events and projects.	Limited knowledge of elected officials. Does not invite elected officials to events or activities.
Impact Data	Successfully integrates and actively maintains a stakeholder education plan that includes dissemination of impact data to elected officials; utilizes core messages to cultivate champions and increase knowledge of the program. Shares best practices with the national service network.	Implements stakeholder education plan that includes dissemination of impact data to elected officials. Develops core messages to cultivate champions and increase knowledge of the program.	Researches and develops stakeholder education plan that incorporates the dissemination of impact data to elected officials.	Limited knowledge of how to educate stakeholders and the process for disseminating impact data.

3.5. AmeriCorps Program Director Checklist

Materials Needed: *Serve Wisconsin Program Director Handbook, Application Instructions & Notice of Federal Funding Opportunity, Request for Proposal, Notice of Grant Award, AmeriCorps Terms and Conditions, and AmeriCorps Regulations, Office of Management and Budget (OMB) Cost Principles and Uniform Administrative Requirements, and AmeriCorps Grant Agreement.*

Purpose: To ensure that AmeriCorps program staff have the information necessary to successfully administer and manage an AmeriCorps program. This form serves as a diagnostic tool for Program Directors.

Instructions: *Please check the box for each statement if you agree that it describes your knowledge or your ability to properly implement the practice in your program, or check N/A if the practice does not apply to your organization. After finishing this exercise, please review your form and use the information to identify areas where additional training or technical assistance may be beneficial. Use the Program Director Training and Technical Assistance Request Form (Section 3.6) to request training on any topic on which you would like more information.*

Serve Wisconsin is firmly committed to providing access, equal opportunity and reasonable accommodation in its activities and materials. If you have any questions about inclusion or reasonable accommodations, please contact your Serve Wisconsin Program Officer.

A. Effective Grant and Program Management

Governing Documents

Objective: To ensure a thorough understanding of the Notice of Grant Award, regulations, Uniform Administrative Requirements, AmeriCorps Terms and Conditions, guidance, policies and procedures governing the management and administration of an AmeriCorps program in Serve Wisconsin.

- ❑ Provide a basic overview of the governing documents for AmeriCorps and a basic description of the information found within that document
- ❑ Locate information related to various management components of the AmeriCorps program (both the information located at your physical office location and the information available online)
- ❑ Describe the steps you would take to locate the answer to a question related to the governing policies of the program if it is an issue that is unfamiliar to you
- ❑ Identify situations in which your program must provide notice to CNCS or Serve Wisconsin and the timeline in which most notifications must occur
- ❑ Identify what types of changes require prior approval from Serve Wisconsin or CNCS

Program Design

Objective: To ensure that programs have an overall Theory of Change that supports the program activities (intervention) and that the activities are evidence-based approaches directly connected to the identified need and underlying root causes; including a well-detailed, approved grant application and

budget that support the program goal, contain measureable objectives and regular programmatic evaluation.

- ❑ Describe the program's Theory of Change
- ❑ Describe the evidence in support of the program's Theory of Change
- ❑ Explain how the member activities support the Theory of Change and address the underlying causes of the community need
- ❑ Articulate why a program design is important and how it relates to position and member conversions and member early terminations
- ❑ Describe how the member positions and terms of service support the program design
- ❑ Describe how the member positions do not duplicate an activity that is already available or substantially equivalent to activities provided by State or local government agencies in the locality(ies) of the program.
- ❑ Describe how the member positions do not displace an employee, volunteer, or vacant position, including partial displacement such as reduction in hours, wages, or employment benefits.

Internal Staff Communication and Coordination

Objective: To ensure that individuals involved with the AmeriCorps program are aware of AmeriCorps and National Service and are well-versed in its purposes, goals and value; that they have an understanding of program requirements, reporting timelines, strategic and policy issues, and that the program is integrated into the organization at all levels.

- ❑ Name the other individuals in your organization who are also responsible for administering the AmeriCorps program and describe how your work is coordinated with theirs to ensure compliance and continuous improvement
- ❑ Avenues for oversight and regular communication are in place among key staff
- ❑ Cross-training and established systems provide for back-up in cases of staff absences or emergencies
- ❑ Describe the internal policies and procedures that are used for management of the AmeriCorps program

Record-Keeping

Objective: To ensure that appropriate and complete documentation for all grant-related activities are maintained according to grant requirements.

- ❑ An organized system is used for organizing grant-related documents
- ❑ Program director and other grant staff know where various grant documents are kept, including whether any are kept in secure locations
- ❑ Identify the record retention period for your organization's AmeriCorps records

Site Partner Management

Objective: To ensure the program clearly outlines relationships with site partners through formal agreements and that it manages these relationships.

- ❑ Section Not Applicable – Program has no Host Sites

- ❑ Outline selection criteria used to choose site partners
- ❑ Ensure sites are accessible to people with disabilities
- ❑ Ensure written site partner agreements
- ❑ Include a plan for site partner orientation comprised of:
    - Prohibited activities
    - Program mission
    - AmeriCorps 101
    - Site monitoring tool and schedule
    - Data collection plan
    - Program feedback and evaluation tools
    - Program feedback and evaluation schedule
- ❑ Include a plan for orienting site partners absent from initial orientation
- ❑ Include a plan for identifying sites as AmeriCorps sites by displaying banner or sign
- ❑ Include a plan for monitoring activities at host sites, including monitoring compliance of policies and procedures of the AmeriCorps program, program performance data fidelity, and adequate supervision of members.

Tracking, Recording and Reporting Progress

Objective: To ensure the program is collecting, documenting, and reviewing necessary data; that it is on track to meet its stated objectives; and that it submits accurate and timely reports of AmeriCorps-related performance measure objectives.

- ❑ Describe how the program will record all data relating to performance measures
- ❑ Describe how program will retrieve information from site partners
- ❑ Outline a performance measure schedule
- ❑ Describe how staff will review data to ensure program is on track to meet its stated objectives
- ❑ Describe how the OnCorps system is used to record and report progress
- ❑ Ensure required progress reports to Serve Wisconsin are on time
- ❑ Ensure National Performance Measure criteria are met (if applicable)

Continuous Improvement

Objective: To ensure the program evaluates the quality of its service activities which includes involving extensive broad-based representation from the following: the community served, members and potential members, site partners, community-based agencies with a demonstrated record in providing services, foundations and businesses.

- ❑ Identify stakeholder groups
- ❑ Plan to provide information and progress to stakeholder groups
- ❑ Have at least one formal method in place to gauge member satisfaction
- ❑ Have at least one formal method in place gauge service recipient satisfaction
- ❑ Have at least one formal method in place to gauge management effectiveness
- ❑ Have a plan to continuously assess community needs
- ❑ Include a plan to consult with the community on program design
- ❑ Include a plan to consult with the community on program implementation
- ❑ Include a plan to consult with the community on program evaluation

B. Member Human Resources

Recruitment

Objective: To ensure a fair and equitable recruitment process in order to create a diverse potential applicant pool that meets program needs.

- ❑ Describe a non-discriminatory, fair and equitable recruitment process
- ❑ Include consultation with leaders in the disability community for help with recruitment of AmeriCorps members
- ❑ Include a plan to recruit locally
- ❑ Include a plan to recruit a diverse corps
- ❑ Include a plan to recruit members who meet program needs
- ❑ State reasonable accommodations can be made for interviews

Selection

Objective: To ensure a fair and equitable member selection process by demonstrating a consistent application process followed for each applicant.

- ❑ Ensure completed and signed member application
- ❑ Ensure uniform selection documentation
- ❑ Guarantee members are chosen based on essential functions in position description
- ❑ Assess a member's ability to complete the essential functions of the position with/without reasonable accommodation
- ❑ State reasonable accommodations can be made for service
- ❑ Notification to members who are accepted to the program

Eligibility and Enrollment for Members

Objective: To ensure that the program has all necessary documentation for each member in their member files and that member information and service locations are entered in the My AmeriCorps portal within 30 days of member enrollment.

- ❑ Ensure members do not serve until all eligibility documentation is on file
- ❑ Ensure member enrollment is completed in the Portal within 30-day period
- ❑ Ensure member service agreement is signed on or before first day of service
- ❑ Ensure member service location entered into the Portal within 30-day period
- ❑ Ensure required background checks are conducted
  - **National Sex Offender Public Website (NSOPW)** – completed on or before the member's first day of service
  - **Wisconsin Circuit Court Access Check** – completed on or before the member's first day of service.
  - **State Criminal Records Check(s) (with official state repository)** – initiated on or before the member's first day of service
  - **FBI National Fingerprint Check** for covered individuals – initiated on or before the member's first day of service
- ❑ Ensure member accompaniment occurs according to regulations if access to vulnerable populations and both state and FBI checks are still pending

- ❑ Ensure that the program has a clear policy on who will ensure that the background checks are not just initiated but that the checks are completed.
- ❑ Ensure copies of the following documents are in all member files
  - **Member Application**
  - **Member Eligibility Form**
  - **Criminal History Check Procedure Verification Form**
  - ***<u>In Separate File--Background Check Proof of:</u>***

Wisconsin State Criminal History Registry Check:	Date initiated - Date completed
State of Residence Criminal History Registry Check:	Date initiated - Date completed
FBI Fingerprint Check:	Date initiated - Date completed
National Sex Offender Public Registry (NSOPW):	Date completed
Wisconsin Circuit Court Access (WCCA) check:	Date completed

  - **Member Contract**
  - **Publicity Release Form** that includes Serve Wisconsin & CNCS
  - **Health Care request /waiver** *(Full time members only - <u>Not applicable to EAP & Professional Corps program</u>)*
  - **Child Care request /waiver** *(Full time members only - <u>Not applicable to EAP program</u>)*
  - **Performance Evaluations** (mid-term for 1700 & 900 hour positions, end of term for *all* members)
  - **Exit/End-of-Term Forms**
    - ➢ Documentation of early exits or suspensions
    - ➢ End-of-Term evaluation for early exits

<u>Member File *Required* Items - *Youth Corps ONLY*</u>

  - **Youth Corps CPR/First Aid Training Certificate**
  - **Two terms in one program year?**
    - ➢ Documentation of communication with Serve Wisconsin staff
    - ➢ Signed document with 12-15-10 Official Guidance Memo (Youth Corps) information regarding two Consecutive Terms/Same Program Year.
  - **Member under 16-years-old when enrolled?**
    - ➢ Signed document with 8-23-02 Official Guidance Memo (Youth Corps) information regarding Enrolling 16-year-olds
  - **Member serving in a Quarter Time or Minimum Time Position?**
    - ➢ Signed document with 8-23-02 Official Guidance Memo (Youth Corps) information regarding Use of Quarter Time and Minimum Time Positions

<u>Tracking Member Hours</u>

Objective: To ensure that timesheets are kept in a manner that is consistent with AmeriCorps requirements and members are on track to meet the required number of service hours.

- ❑ Program has policies for members on how to record time accurately, including instances of pay periods with zero hours served and additional service hours
- ❑ Ensure members hours are recorded appropriately in OnCorps under "service, fundraising or training hours" ONLY

- ❑ Ensure that hours are entered by members and approved by site supervisors in a timely manner
- ❑ Ensure that first timesheet corresponds with enrollment date which is noted on the service agreement as the member start date
- ❑ Ensure each member remains within the allowable 10% fundraising limitation and the aggregate total hours of training for all members remains within the 20% limitation
- ❑ Ensure members receive required trainings and that these hours are documented appropriately on their timesheets under "training"
- ❑ Ensure that members' holiday/sick leave are not counted in the member service hours and that these hours are considered in ensuring that members have adequate time to complete their service
- ❑ Ensure members are on-track to meet their required service hours
- ❑ Ensure member service hours are substantiated by timesheets
- ❑ Ensure program communicates with members about progress towards completing hours
- ❑ Ensure mid-term evaluation is completed and retained in the member file (including the three required AmeriCorps questions)

Suspending Members

Objective: To ensure that there is a consistent process for suspending members that includes suspension forms, documentation for compelling circumstances, suspending the member in the Portal within 30 days of the suspension date, and an established procedure for the member to return to service.

- ❑ Ensure that Serve Wisconsin has been notified of suspension
- ❑ Ensure that there is written documentation from the member detailing the nature of the compelling circumstances or written documentation from the program detailing other reason(s) for the suspension
- ❑ Ensure member suspension is entered into the Portal and OnCorps within 30 days of effective date
- ❑ Ensure that member and program have established on-going communication process during the suspension period, including an anticipated return date
- ❑ Ensure that program disciplinary policies account for a member's failure to return from suspension as a reason for termination for cause
- ❑ Ensure that benefits (living allowance, health insurance and child care) are suspended for members by notifying appropriate agencies (N/A compelling personal circumstance suspensions)

Exiting Members

Objective: To ensure a consistent process for exiting members that includes exit forms, documentation for early release if applicable (cause or compelling circumstances) and exiting out of the My AmeriCorps Portal with correct hours reported within 30-days of the end of the term of service.

- ❑ Ensure members have completed all hour and program requirements for successful completion before exiting
- ❑ Ensure all member paperwork is in file prior to exiting member
- ❑ Ensure members served for the length of service term outlined in the member contract
- ❑ Ensure members' exit dates coincide with last time sheets in OnCorps
- ❑ Ensure members' total hours in OnCorps matches exit forms

- ❑ Ensure member end of service evaluation is completed and included in member file (including three required AmeriCorps questions)
- ❑ Ensure National Service Trust End of Term/Exit Form is completed on paper or electronically in My AmeriCorps Portal by member and in My AmeriCorps Portal by program staff
- ❑ Ensure members are exited in the My AmeriCorps Portal within 30 days of their exit date

Additional Actions for Early Exits

Compelling Personal Circumstances

- ❑ Ensure that Serve Wisconsin has been notified of plan to terminate a member for CPC
- ❑ Ensure proper documentation of reasons for CPC exit
- ❑ Complete end-of-term evaluation

Early Exit for Cause (any reason)

- ❑ Ensure proper documentation of reasons for early exit
- ❑ If disciplinary: include documentation of progressive discipline
- ❑ Determine satisfactory/non-satisfactory performance
- ❑ Complete end-of-term evaluation

C. Member Support

Developing and Implementing Member Training

Objective: To ensure that Members are prepared for service, civic engagement, and personal development through a planned, consistent and structured method.

- ❑ Plan to provide a comprehensive member orientation including:
  - Member rights and responsibilities
  - Prohibited activities
  - Suspension/termination from service
  - Sexual harassment and other discrimination issues
  - Grievance procedures
  - Code of conduct
  - Requirements under the Drug-Free Workplace Act
  - History of AmeriCorps & National Service
  - AmeriCorps in Wisconsin
  - Role of Serve Wisconsin
  - Conflict Resolution Training
- ❑ Plan for orienting members to their service sites
- ❑ Plan for supporting members in obtaining GED (if applicable)
- ❑ Plan for encouraging members to be civically engaged
- ❑ Plan for in-service or ongoing training with agendas for:
  - Civic Engagement (required for all members)
  - Volunteer Management
  - Life After AmeriCorps
  - Communication
  - Disaster
  - CPR/First Aid for Youth Corps program participants

- ❑ Plan for involving members in selection of training
- ❑ Plan for supporting members in making the transition after end of service
- ❑ Plan to use structured activities for members to reflect on service and connect to the national service movement

Member Supervision

Objective: To ensure members receive appropriate supervision, that reasonable accommodations are made when appropriate, and that supervisors evaluate the member performance at the required times during the service year.

- ❑ Describe how to provide on-site supervision of all members OR ensure that members receive adequate supervision
- ❑ Describe how to monitor member service activities and ensure that they are aligned with member position description and that members are not engaging in prohibited activities
- ❑ Describe how to make reasonable accommodations for members as requested based on the essential functions of the position description
- ❑ State who is responsible for overseeing member grievances
- ❑ Describe a member evaluation schedule
- ❑ Include a mid-term member evaluation (if applicable)
- ❑ Include an end-term member evaluation
- ❑ Describe accompaniment of members with pending background checks

D. Fiscal Oversight & Management

Financial Management Systems

Objective: To ensure that grant-related expenses are properly reported; that programs maintain financial management systems that include written cost allocation procedures and systems that distinguish expenditures attributable to this grant as well as expenditures not attributable to this grant; and that adequate supporting documents for expenditures are maintained. This system will be reviewed during the desk review process and should minimally include:

- ❑ Disbursements
- ❑ Receipts
- ❑ Account Reconciliation
- ❑ Variance Analysis – Budget vs. Actual

Documentation of Matching Funds

Objective: To ensure the program has sufficient matching funds available for the upcoming program year and that these funds are properly documented.

- ❑ Describe what in-kind resources are used as match to your AmeriCorps grant and how these resources are documented and kept separate from other agency finances
- ❑ Describe the cash resources that are used as match to your AmeriCorps grant, whether any of these resources are from other federal funding sources, and how these resources are documented and kept separate from other agency finances

- ❑ Describe what program income means and the steps by which the program must report any income

Reimbursement & Advance Payments

Objective: To ensure the program submits accurate and timely financial reports for the AmeriCorps program. Both the Serve Wisconsin Program Officer and the Fiscal Department will review this information.

- ❑ If requesting reimbursements, describe the system and the forms used to make these requests
- ❑ If requesting advance payments, describe the system, forms and documentation that must be submitted with these requests
- ❑ Describe how you work with the fiscal staff at your organization to submit the required financial reports and requests

Budgeting & Amendments

Objective: To ensure the program plans for and monitors expenditures and matching resources for compliance with CNCS and Serve Wisconsin requirements.

- ❑ Describe what is meant by the accounting terms, "allowable, reasonable, allocable and consistent treatment" and how these apply to the AmeriCorps grant
- ❑ Describe the basic components of the AmeriCorps budget, including the amount of federal funds and matching resources identified in your current budget
- ❑ Describe how the budget is tied to the objectives and goals of the program
- ❑ Describe how you work with financial staff to monitor the budget and make adjustments
- ❑ Describe how and when a budget amendment is needed and how one is requested
- ❑ Describe how the accounting system separates AmeriCorps costs from other agency costs and how these costs are tracked by grant year (as opposed to agency fiscal or calendar year)

Member Living Allowances

Objective: To ensure the program understands the requirements for disbursement of member living allowances.

- ❑ Not Applicable – Program does not provide member living allowances.

- ❑ Describe disbursement process of member living allowance payments
- ❑ Describe how program reconciles payments to members who start the program late
- ❑ Describe how the program documents members who are serving in different positions and should be reimbursed at different rates

3.6. Program Director Training and Technical Assistance Request Form

Name: _____ **Date:** _____

Grantee/Program Name: _____

Based on completion of the Serve Wisconsin AmeriCorps Program Director Checklist, the following areas of training or technical assistance could be beneficial (please check as appropriate):

Effective Grant and Program Management

- ❑ Governing Documents
- ❑ Program Design
- ❑ Internal Staff Communication and Coordination
- ❑ Record-Keeping
- ❑ Site Partner Management
- ❑ Tracking, Recording and Reporting Progress
- ❑ Continuous Improvement

Member Human Resources

- ❑ Recruitment
- ❑ Selection
- ❑ Eligibility & Enrollment
- ❑ Tracking Member Hours
- ❑ Suspending Members
- ❑ Exiting Members

Member Support

- ❑ Developing & Implementing Member Training
- ❑ Member Supervision

Financial Oversight and Management

- ❑ Financial Management Systems
- ❑ Documentation of Matching Funds
- ❑ Reimbursements & Advance Payments
- ❑ Budgeting & Amendments
- ❑ Member Living Allowances

Return this form to your Serve Wisconsin Program Officer.

Chapter 4 – Program Design & Management

Contents

4.1. Program Identification (Terms and Conditions) 50

A. AmeriCorps Logo (Terms and Conditions - Specific III.B) 50

B. Member Service Gear (AmeriCorps*State Agreement Addendum #1) 50

C. Service Site Signage 51

D. Media Inquiries 51

E. Member Public Outreach Activities 51

4.2. Site Management (Terms and Conditions) 52

A. Written Site Agreement 52

B. Site Selection (45 CFR §2522.450 and 45 CFR §2522.475) 52

C. Host Site Monitoring 52

4.3. Performance Measures & Progress Reports (45 CFR 2522.530- 45 CFR 2522.650) 53

A. OnCorps Grantee Progress Report (GPR) 53

B. Volunteer Mobilization Report 53

C. Member Reflections 54

D. Modifications to Approved Performance Measures 54

4.4. Evaluation (45 CFR 2522.500-540 and 45 CFR 2522.700-810; Annual NOFO/RFP) 55

A. Requirements 55

B. Reporting on Evaluation 55

C. Program Evaluation Cycles 56

4.5. Disaster Preparedness and Response 57

A. Extension of member term for disaster purposes 45 CFR 2522.220(f) 57

4.6. Members Serving as Reading Tutors/Requirements for Tutoring Programs (45 CFR 2522.900-950) 58

A. Tutoring Member Requirements 58

B. Tutoring Program Requirements 58

4.7. AmeriCorps Days of Service 59

A. National Days of Service (Agreement Addendum #1) 59

B. Reporting Days of Service 59

4.1. Program Identification (Terms and Conditions)

As a program that is part of the AmeriCorps National Service Network and Wisconsin's AmeriCorps, the subgrantee agrees to identify its program as an AmeriCorps Program and participants as AmeriCorps members in the following ways (in addition to meeting the federal requirements regarding affiliation with the AmeriCorps national service network):

A. AmeriCorps Logo (Terms and Conditions - Specific III.B)

All subgrantee websites shall clearly state that they are an AmeriCorps subgrantee and shall prominently display the AmeriCorps logo. The subgrantee may not alter the AmeriCorps or Serve Wisconsin AmeriCorps logo, and should individualize the logo with their program name only in accordance with the Corporation for National and Community Service's (CNCS) guidelines. Programs must obtain the written permission of CNCS, through Serve Wisconsin (also referred to as the *Commission*), before using the AmeriCorps name or logo on materials that will be sold. High quality downloads of the logos are available on the CNCS website.

Donors to local programs may not use the AmeriCorps or Wisconsin AmeriCorps name or logo in advertising or other promotional materials without the express written permission of CNCS, obtained through Serve Wisconsin. Permission may be withheld if recognition of the donor is inconsistent with Serve Wisconsin's and the Corporation's policies.

B. Member Service Gear (AmeriCorps*State Agreement Addendum #1)

It is a requirement that the program provide each of their AmeriCorps members with a basic AmeriCorps service gear package of the program's choosing, because it is required that members wear some type of AmeriCorps identification at all times during their service hours (during service hours and training/education activities). For example, in addition to member uniforms, an AmeriCorps pin, nametag with the logo or AmeriCorps patch or lanyard would be acceptable forms of identification.

Programs may design and provide program-specific member gear and include this in the program's budget. An item with the AmeriCorps logo is a required budgeted expense. Subgrantees may add the AmeriCorps logo to their own local program uniform items using federal funds. Except for safety equipment, subgrantees may only charge the cost of member service gear to the federal share if it includes the AmeriCorps logo. All safety gear may be charged to the federal share, regardless of whether it includes the AmeriCorps logo. All other service gear without the AmeriCorps logo must be purchased with non-CNCS funds.

The official National Service Gear provider is Industries of the Blind located in Milwaukee. Other providers used by subgrantees include, but are not limited to, Bella's Custom Design, and Good Deed. Serve Wisconsin provides information for service gear providers, but does not recommend one provider over another.

C. Service Site Signage

AmeriCorps service sites are required to be clearly identified as AmeriCorps service sites with the appropriate AmeriCorps signs, including the AmeriCorps logo (at a minimum).

D. Media Inquiries

Program representatives should provide information only on their local AmeriCorps program. Media inquiries pertaining to AmeriCorps programs, Serve Wisconsin, the Corporation for National and Community Service, statewide initiative areas, statewide performance measures or other statewide statistics/information, etc. should be directed to Serve Wisconsin Executive Director Jeanne Duffy at (608) 261-6716.

During media responses, the programs should use the following language regarding the Commission and its role/relationship to the state's AmeriCorps programs: "Serve Wisconsin is the state agency responsible for distribution of grant funding, technical assistance, training, support and oversight of Wisconsin's AmeriCorps programs. Additional information on the Commission or Serve Wisconsin's AmeriCorps programs can be found at http://servewisconsin.wi.gov/."

Programs are encouraged to share local media coverage of their AmeriCorps programs, members and/or program directors with the Commission through their program officer. Programs may submit information electronically to their program officer's email address or via fax to 608-266-9313. In addition, programs are encouraged to submit press coverage in the Member Reflections Form. For more information, see section C. Member Reflections.

E. Member Public Outreach Activities

In all official program communications, including press or promotional marketing, AmeriCorps members should be identified as such. It would be appropriate to mention both the program and the fact that the member is supported through AmeriCorps – for example, Jean Smith, AmeriCorps member with ABCD Wisconsin AmeriCorps Program.

4.2. Site Management (Terms and Conditions)

AmeriCorps programs that utilize host sites for placement of AmeriCorps members should ensure that they are effectively managing those partnerships through signed written agreements that support overall program goals and quality member experiences. Serve Wisconsin AmeriCorps programs are expected to monitor sites for compliance and provide technical assistance and support to continuously improve host site management and placements.

A. Written Site Agreement

All programs should have a written site agreement in which both parties attest to their roles and responsibilities in the partnership. At a minimum, the agreement should cover the responsibilities of the site supervisor related to member oversight, evaluation and training, the member activities that are prohibited, the disciplinary procedures and the role of the supervisor in member discipline and termination, and financial and performance obligations on the part of the site (including when and under what circumstances these obligations would terminate or be reduced). These agreements should be reviewed and reissued on at least an annual basis and revised as needed. Depending on the scope and nature of the project, additional items may be covered in the written site agreement. Sample site agreements can be found on Basecamp. Host site agreements are reviewed by Serve Wisconsin during the program's document review monitoring. Programs may submit a copy of their written site agreement to the Commission for review if changes are made.

B. Site Selection (45 CFR §2522.450 and 45 CFR §2522.475)

Wisconsin AmeriCorps programs are encouraged to utilize a written site selection process for continuous improvement and to maximize the mutually beneficial relationship between the organization and its sites. Programs must ensure that the site selection plan incorporates the criteria required by regulations (quality, innovation, sustainability, quality of leadership, past performance and community involvement). In addition, programs are required to ensure that the process also addresses the special considerations (program models, program activities and programs supporting distressed communities). This plan is described within the AmeriCorps grant application.

C. Host Site Monitoring

AmeriCorps programs must have and implement a plan for oversight and monitoring to ensure that each subrecipient and/or service site has agreed to comply, and is complying, with award requirements.

4.3. Performance Measures & Progress Reports (45 CFR 2522.530- 45 CFR 2522.650)

Performance measures (PMs) and progress reports are used to report AmeriCorps achievements during the program year. During the grant application and contract approval process, the program develops and the Commission and CNCS approve national performance measures and/or program-identified performance measures to be reported to CNCS. During first quarter progress reports, performance measures, including a description of the measurement tools you intend to use, must be entered into OnCorps.

Quarterly progress reports are due in OnCorps on January 20 (agreement start date-12/31), April 20 (covering 1/1-3/31) and October 15 (covering 4/1-9/30) of each program year. At your program officer's discretion, you may be required to submit two separate reports for the 4/1-9/30 reporting period. Your program officer will inform you if two separate reports will be required. Reports should be completed for the dates mentioned, regardless of whether the program year ended prior to 9/30 or is not yet completed. In addition, programs that receive an extension past September 30 in Quarter 4 must complete a final performance measure report by January 20 of the following year.

Deadlines are detailed in the *Important Due Dates* document and the Basecamp calendar. Failure to submit the information by the deadline can result in punitive action, such as suspension of grant payments. In addition, program progress reporting and timeliness are factors for consideration in grant review. Quarterly progress reporting requirements and instructions can be found in the *Program Progress Report – Quarterly* document.

A. OnCorps Grantee Progress Report (GPR)

OnCorps consolidated much of what was previously required for quarterly progress reporting to one section, *OnCorps GPR*. In order to submit the GPR to Serve WI, you will need to complete **all** six sections, which are as follows: General Information, Demographics, MSY Report, Performance Indicator, Performance Measures, and Narratives. We recommend that before you enter data into OnCorps, that you first write narrative outside of the system, because the report will timeout after a short period of inactivity.

The OnCorps GPR can be found under Reporting → Submit Program Reports → OnCorps GPR. Step-by-step instructions and more details on the reporting requirements can be found *Program Progress Report – Quarterly* document.

B. Volunteer Mobilization Report

Outside of the OnCorps GPR, quarterly programs are required to submit progress in the Volunteer Mobilization Report. Programs are required to report the number of episodic and ongoing volunteers recruited/supported directly by AmeriCorps members along with the number of hours those volunteers served. For more information regarding the reporting requirements and instructions guiding the reporting can be found in the *Program Progress Report – Quarterly* document.

C. Member Reflections

Programs are expected to submit member reflections pieces in conjunction with each quarterly progress report you submit. For example, if your Program Officer does not require you to submit Q3 Progress Reports, then you would not be expected to submit any member reflection pieces for that quarter.

Serve Wisconsin is particularly interested in the member reflections that program staff feel are some of the higher quality reflection pieces, particularly those that include photos. Receiving reflection pieces from every Serve Wisconsin AmeriCorps member for a given program year would be simply too much content for the intended purposes. As such, programs are encouraged to provide high quality reflections only.

For step-by-step instructions and more on the requirements for member reflections, please refer to the *Member Reflections Instructions for Program Directors* document.

D. Modifications to Approved Performance Measures

If, during the program year, a program would like to request a performance measure modification, it must develop and submit to the Commission a written request that includes:

1. Why you are not on track to meet performance requirements
2. How you have been tracking the performance measure
3. Evidence of the corrective actions you have taken
4. Any new proposed performance measures, targets, and/or instruments
5. Your plan to ensure that you meet any new measures

PM modification requests must be submitted to Serve Wisconsin within 30 days of determining that you are not on track to meeting your performance measures. No performance measure modification request will be accepted after the end of the second quarter (April 1st). A request letter (email or otherwise) must be received by Serve Wisconsin before formal consideration will be given to a modification request.

In quarterly progress reporting and at other times as needed and described in the Commission's risk-based monitoring policy, Commission staff will review the performance measure progress reports and may request reporting documents or other supporting materials to determine whether programs are on track to meet their measures. If it is determined that the program has not made appropriate progress, Serve Wisconsin expects that the program will develop a corrective action plan. Similarly, programs that identify challenges to meeting their performance measures at any time during the year should immediately notify their program officer.

Please refer to the following attachments to your AmeriCorps grant agreement for more information: *AmeriCorps Program Modification Guidelines; Sample Performance Measure Modification Letter.* These documents can be found in the Program Resources – Modifications folder on Basecamp.

4.4. Evaluation (45 CFR 2522.500-540 and 45 CFR 2522.700-810; Annual NOFO/RFP)

A program evaluation is required for all programs that have been funded through Serve Wisconsin for more than three years. When applying for funding year four, the program must submit an evaluation plan. Every three years thereafter, the program must submit an evaluation report according to the instructions in Serve Wisconsin's Request for Proposals (RFP), as well as an evaluation plan for the next three-year period. Completed evaluation reports must be sent by the application deadline set in the RFP and sent as an additional document. Programs must fully cooperate with any CNCS and Serve Wisconsin evaluation efforts. Serve Wisconsin Program Officers will communicate with programs on evaluation status. Please contact your program officer if you have any questions regarding your requirements. In addition, Evaluation FAQs prepared by CNCS and the Evaluation Resources on the Knowledge Network are valuable resources for evaluation-related information.

A. Requirements

i. $500,000 or more in AmeriCorps Funding

All programs receiving average annual CNCS program grant of $500,000 or more must arrange for an external evaluation and submit the evaluation results with their application for re-compete funding.

ii. Less than $500,000 in AmeriCorps Funding

Programs receiving average annual CNCS grant less than $500,000 in AmeriCorps funds are required to conduct an internal or external evaluation. The evaluation must cover a minimum of one year, but may cover longer periods.

B. Reporting on Evaluation

The first time a program recompetes at the competitive or formula level, after its first three-year cycle, an evaluation plan must be submitted with the grant application. After a second three-year grant cycle, a program recompeting would need to submit a completed evaluation with the grant application. A program will be considered a recompeting application if it satisfies the CNCS definition of "same project" (see below) and has been funded competitively for at least one three-year cycle. If the project satisfies the definition of same project, and the applicant has completed one three-year cycle, it will be required to submit an evaluation plan. If the project does not satisfy the definition, it will be considered new and will not be required to submit an evaluation plan, summary, or completed evaluation. Refer to the most recent RFP for more guidance on evaluation timelines and requirements.

Two projects will be considered the same if they:

- Address the same issue areas
- Address the same priorities
- Address the same objectives
- Serve the same target communities and population

- Utilize the same sites
- Use the same program staff and members

There is flexibility on what the evaluations should contain and how they should be structured. Serve Wisconsin staff will provide programs with technical assistance as needed. Evaluation plans must include the following:

- A short description of the theory of change - why the proposed intervention is expected to produce the proposed results
- Outcome of interest - clear and measurable outcomes that are aligned with the theory of change and will be assessed during the evaluation
- Research questions to be addressed by the study - concrete research questions (or hypotheses) that are clearly connected to the outcomes
- Study components – a) a proposed research design for the evaluation including a rationale for the design selected, an assessment of its strengths and limitations, and a description of the main components; b) description of the sampling methods, measurement tools, and data collection procedures, and c) an analysis plan
- Qualifications needed for the evaluator
- The proposed budget

C. Program Evaluation Cycles

For more information about your program's evaluation cycle and when your first/next program evaluation plan and/or report is due, please review the information posted on Basecamp in the Program Evaluation folder.

4.5. Disaster Preparedness and Response

CNCS has refocused many national service efforts to assist with the response to natural disasters. Serve Wisconsin is committed to assisting with statewide preparedness for, response to and recovery from disasters. Serve Wisconsin encourages programs to include member service activity that would involve members in disaster preparedness or response. This could include member training activities that would involve members in local disaster response or limited deployments to areas in the nation affected by disasters.

AmeriCorps programs can play an integral role in helping prepare for and respond to disasters. Serve Wisconsin AmeriCorps programs may participate in disaster preparedness, response and recovery activities as appropriate to their program design on a short or long-term basis. To that end, subgrantees are encouraged to develop policies to allow for members to provide disaster services, both within Wisconsin and nationally, in the event one occurs. It is acceptable for members to receive hours towards their term of service for participating in local, state, and national level disaster deployments and training opportunities, based on their program's approved disaster policy, so long as there is a system in place to track members' activities and hours. If your program intends to engage in disaster relief on a long-term basis, and thus, significantly change the focus of the program, your program officer should be contacted to potentially amend your AmeriCorps grant application.

A. Extension of member term for disaster purposes 45 CFR 2522.220(f)

If approved by the Corporation, a program may permit an AmeriCorps participant performing service directly related to disaster relief efforts to continue in a term of service for a period of up to 90 days beyond the period otherwise specified. A period of service performed under this regulation shall constitute a single term of service for the purposes of 45 CFR 2526.50(a).

4.6. Members Serving as Reading Tutors/Requirements for Tutoring Programs (45 CFR 2522.900-950)

Tutor, as defined in 45 CFR 2522.900, is someone whose primary goal is to increase academic achievement in reading or other core subjects through planned, consistent, one-to-one or small-group sessions and activities that build on the academic strengths of students in kindergarten through 12th grade, and target their academic needs. A tutor does not include someone engaged in other academic support activities, such as mentoring and after-school program support, whose primary goal is something other than increasing academic achievement. For example, providing a safe place for children is not tutoring, even if some of the program activities focus on homework help.

A. Tutoring Member Requirements

Members serving as tutors are required to have at least a high school diploma or equivalent and have successfully completed pre- and in-service training for tutors.

B. Tutoring Program Requirements

Programs that provide tutoring activities must give members appropriate supervision by individuals with expertise in tutoring. In addition, tutoring programs are required to ensure all members receive high-quality, research-based training consistent with the instructional program of the local educational agency and State academic content standards. Documentation of supervisors and training provided must be maintained by the program and be made available for review during monitoring visits and/or audits.

4.7. AmeriCorps Days of Service

A. National Days of Service (Agreement Addendum #1)

Each enrolled AmeriCorps member is required participate in at least one National Day of Service during their term. Programs report on participation quarterly in the Narratives section of the OnCorps GPR. National Days of Service include the following:

September 11th National Day of Service and Remembrance

Make a Difference Day

Veteran's Day

Family Volunteer Day

Martin Luther King Jr. Day of Service

AmeriCorps Week

National Volunteer Week

Global Youth Service Day

Please refer to Basecamp's calendar for specific dates for this year's National Days of Service. If you would like to recognize any other day or multiple days as a National Day of Service, please request permission from your Serve Wisconsin Program Officer. The request must include information about the community service project(s) that will take place on the specified day(s).

B. Reporting Days of Service

Please see the *Program Progress Report – Quarterly* document for instructions to report national days of service.

Chapter 5: AmeriCorps Member Management

Contents

5.1. Eligibility, Selection, and Enrollment of Members (45 CFR 2522.200- 45 CFR 2522.210) 63

A. Eligibility [Terms and Conditions - Specific IX.B and 45 CFR 2522.200] 63

B. Term Limits & Education Award Eligibility [45 CFR 2522.235] 63

C. Minimum Qualifications 63

D. Members without a High School Diploma or GED 64

E. Process to Enroll Members 64

F. Enrollment Documentation 65

G. Enrollment Period 65

H. Reasonable Accommodations and Disability Inclusion [Terms and Conditions - Specific IV.C. and 45 CFR 2522.100(h)] 66

5.2. National Service Criminal History Checks (Regulations 45 CFR 2510, 2522, 2540, 2551 and 2552; Regulations published on October 5, 2012) 68

A. National Sex Offender Public Website Check 70

B. State Criminal Registry Check 71

C. Fingerprint-based FBI Criminal History Record Check 72

D. Wisconsin Circuit Court Access Check 73

E. Approval of Alternative Search Procedure 74

F. Supervision of Member While Results are Pending, Accompaniment 74

G. Checks for Re-Enrolling Members 77

H. Consideration of Criminal History Findings and Member/Staff Acknowledgment 77

I. National Service Criminal History Check Documentation 77

J. Costs Incurred Conducting Criminal History Checks 78

K. Financial Impact of Failure to Comply 78

L. National Service Criminal History Check Training (Terms and Conditions, NSCHC FAQs) 78

5.3. Program Design – Member Positions, Term Length & Activities (Terms and Conditions) 80

A. Member Position Design and Final Enrollment Dates 80

B. Modification of Program Design - Position Conversion 81

C. Calculating Conversions (Terms and Conditions - Specific VI.B and CNCS Policy FAQ) 81

D. Changing Member Term of Service (Terms and Conditions - Specific VI.C and CNCS Policy FAQ) 82
E. Unfilled Member Positions/Position Transfer 83
F. No-Cost Extensions (Grant Contract Article 5, Agreement Addendum #1, clause 14) 83
5.4. Exiting Members and Refilling Positions (Terms and Conditions and 45 CFR 2522.230) 84
A. Member Exits – Education Award Status & Future Service (45 CFR § 2522.230) 84
B. Member Exit – Successful Completion 84
C. Member End Date 85
D. Early Termination for Compelling Personal Circumstances (AmeriCorps State and National Policy FAQs) 85
E. Early Termination for Cause 87
F. Documentation of Early (Cause and Compelling Personal Circumstance) Member Exit 87
G. CNCS Member Exit Survey 87
H. Confidentiality of Member Early Exit Rationale 88
I. CNCS Refill Conditions 88
J. Suspension of Ability to Refill by CNCS 88
K. Organizations Ineligible to Refill 88
5.5. Member Leave or Suspension (45 CFR 2522.230, 2540.220, and 2540.230) 89
A. Member Suspension Process (National Policy FAQs, AmeriCorps Terms and Conditions) 89
B. Family and Medical Leave 90
C. Disciplinary 90
D. Grievance 90
E. Compelling Personal Circumstances 91
F. No Hours Served in a Pay Period 91
5.6. Standards of Conduct & Member Disciplinary Policy (45 CFR 2540.310) 93
5.7. Member Benefits (NOFO/RFP, Terms and Conditions and 45 CFR 2522.240-45 CFR 2522.250) 94
A. Living Allowance (Terms and Conditions - Specific VIII.A, B, and 45 CFR 2522.240) 94
B. Workers' Compensation (Terms and Conditions - Specific VIII.C.4) 95
C. Unemployment Insurance 95
D. AmeriCorps Health Care Policy (Terms and Conditions -Specific VIII.D) 96
E. Childcare (Terms and Conditions and 45 CFR 2522.250) 98
F. Student Loan Deferment and Forbearance 99
G. Public Service Loan Forgiveness (PSLF) and Income-Based Repayment (IBR) 100

H. Segal AmeriCorps Education Award 100
5.8. Member Records (Terms and Conditions, 45 CFR 2522.820) 103
A. Confidential Member Information (Terms and Conditions - Specific IX.C) 106
B. Member Eligibility Documentation (Terms and Conditions - Specific IX.B and Regulations 45 CFR 2522.200) 106
C. Member Enrollments – Paper Forms and My AmeriCorps Portal/eGrants 109
D. Member Contracts & Position Descriptions (Terms and Conditions – Specific V.B) 109
E. Member Position Descriptions (Terms and Conditions – Specific V.A, B) 111
F. Grievance Policy (45 CFR 2540.230) 111
G. Member Benefits 112
H. Member and Staff Timekeeping (Terms and Conditions – Specific V.F, 2 CFR, & Office of Management and Budget Guidance) 112
I. Member Performance Evaluations (Terms and Conditions - Specific V.E, 45 CFR 2522.220[c], 45 CFR 2526.15) 115
J. Member Training 116
K. Member Exits – Paper Forms and My AmeriCorps Portal/eGrants 116
L. Disciplinary Actions 118
M. Suspensions or Early Exits/Terminations 118
5.9. Member Activities 119
A. Creating Compliant Position Descriptions (Terms and Conditions - Specific V.A) 119
B. Member Service Projects and Policies 119
C. Fundraising & Training 119
D. Prohibited Activities (Terms and Conditions - Specific V.C and 45 CFR 2520.65) 120
E. Additional Prohibited Activities (45 CFR 2520.40) 121
F. Teleservice (2017.01 ASN Interim Guidance - Teleservice) 121
5.10. Member Training (Terms and Conditions, 45 CFR 2520.50, and 2522.100) 123
A. Member Orientation [45 CFR 2522.100 (g)(2), and National Policy FAQs] 123
B. Required and Suggested Member Training 123
C. Site Specific Training 124
D. Training Collaboration and Providers 125

5.1. Eligibility, Selection, and Enrollment of Members (45 CFR 2522.200-45 CFR 2522.210)

A. Eligibility [Terms and Conditions - Specific IX.B and 45 CFR 2522.200]

The subgrantee is responsible for following the Corporation's eligibility requirements for members, namely that they must: (1) Be at least 17 years of age at the commencement of service OR be an out-of-school youth of at least 16 years of age participating in a youth corps-type program (42 USC 12572A2) OR an out-of-school youth of at least 16 years of age enrolled in a program for economically disadvantaged youth as defined in the Act (42 USC 12572A9); (2) Have a high school diploma or its equivalent, or be in the process of obtaining one; (3) Be a citizen, national, or lawful permanent resident alien of the United States; (4) Satisfy the National Service Criminal History Check eligibility criteria pursuant to 45 CFR 2540.202.

When the regulations refer to a birth certificate they refer to a legal document certified by and registered with a State's office of vital statistics (often through local vital statistic branches). Although the official document that states the child's name, place of birth, parents' names, and so forth is often filled in at the hospital, it should not be confused with documents distributed by some hospitals that have no legal significance.

Please see Section B. Member Eligibility Documentation (Terms and Conditions - Specific IX.B and Regulations 45 CFR 2522.200) for information regarding the procedure to determine a potential member's eligibility.

B. Term Limits & Education Award Eligibility [45 CFR 2522.235]

Individuals may serve multiple terms of AmeriCorps service, but each branch of AmeriCorps does have term limits. Members may serve up to four terms in AmeriCorps State & National. However, they may only earn up to the value of two full-time education awards. Members who have already earned the maximum education award value may still enroll in subsequent terms of service, but they will receive no end-of-service benefit. Programs should consult with members on how many previous AmeriCorps State & National terms they have served to ensure they do not exceed the limits for this branch of AmeriCorps. Programs and members will see the aggregate value of an individual member's education awards earned to date in the eGrants/MyAmeriCorps Portal (Portal). See Section H. Segal AmeriCorps Education Award for information regarding education awards.

C. Minimum Qualifications

The program is also responsible for establishing the minimum qualifications for membership in its specific program, selecting members that meet those qualifications, and assigning members to projects that are appropriate to their skill level. The grantee must select members in a fair, nonpartisan, nonpolitical and nondiscriminatory manner, without regard to the applicant's need for reasonable accommodation of a disability or child care, without displacing paid employees or community volunteers, and in accordance with its approved application. The grantee is encouraged to select

members who possess a commitment to the goals of AmeriCorps. See Terms and Conditions - General III.L for non-discrimination guidance, in addition to 45 CFR 2522.100, and 2540.210.

D. Members without a High School Diploma or GED

To participate in AmeriCorps, an individual must meet certain education requirements. If members self-certify on their *Wisconsin National and Community Service Board AmeriCorps Member Eligibility Confirmation* form (Member Eligibility Form) that they have a high school diploma or GED, they meet the requirement with no additional documentation required.

If a member does not have a high school diploma or its equivalent at the time of enrollment, the program must ensure that the person did not drop out of school in order to enroll in the program and they must have the member's written agreement on their Member Eligibility Form to obtain a high school diploma or its equivalent before using the education award.

If the member has been determined to be incapable of obtaining a high school diploma or its equivalent, the subgrantee must request a waiver from the Corporation to the diploma/GED requirement. The program must provide an independent evaluation demonstrating the member's inability to meet this requirement as part of its waiver request. The program must retain a copy of the approved waiver and the supporting independent evaluation.

Or, if the applicant does not fall into any of the above categories, he/she is considered eligible for AmeriCorps service if the program has verification of the member's enrollment at an institution of higher education on an ability to benefit basis and eligibility for funds under section 484 of the Higher Education Act of 1965 (20 U.S.C. 1091).

Programs must ensure the availability of support services to members to assist them in earning the equivalent of a high school diploma during their service as specified in [45 CFR 2522.100 (k)(2)].

E. Process to Enroll Members

Members can be enrolled two ways: via the MyAmeriCorps Application Process or via the MyAmeriCorps Invitation Process. Please refer to the Embracing eGrants presentation which contains a step-by-step guide for enrolling a member.

Paper enrollment forms exist, but should only be used in circumstances where it would be burdensome for members to complete the forms in the Portal. Programs must receive written permission from their Serve Wisconsin Program Officer to use the paper enrollment forms. If paper enrollment forms are used, the program must take the information contained on the form and enter it into the Portal on behalf of the member. See 109C. Member Enrollments – Paper Forms and My AmeriCorps Portal/eGrants for more about this approval process for paper enrollment forms.

F. Enrollment Documentation

If the program has received permission to utilize the paper National Service Trust Enrollment Form, a hard copy of manual enrollment documents must be retained in the member file. All enrolled members must be assigned to a service location in eGrants/MyAmeriCorps Portal within 30 days of their enrollment. All service locations should be described by name, full address and ZIP+4 code. Members serving at multiple sites should be assigned to the location where they serve a plurality of their hours.

As stipulated in Agreement Addendum #1, programs are required to complete the Member Documentation Checklist in OnCorps for each enrolled member. The checklist is found under Manage Records → Members → Members in OnCorps.

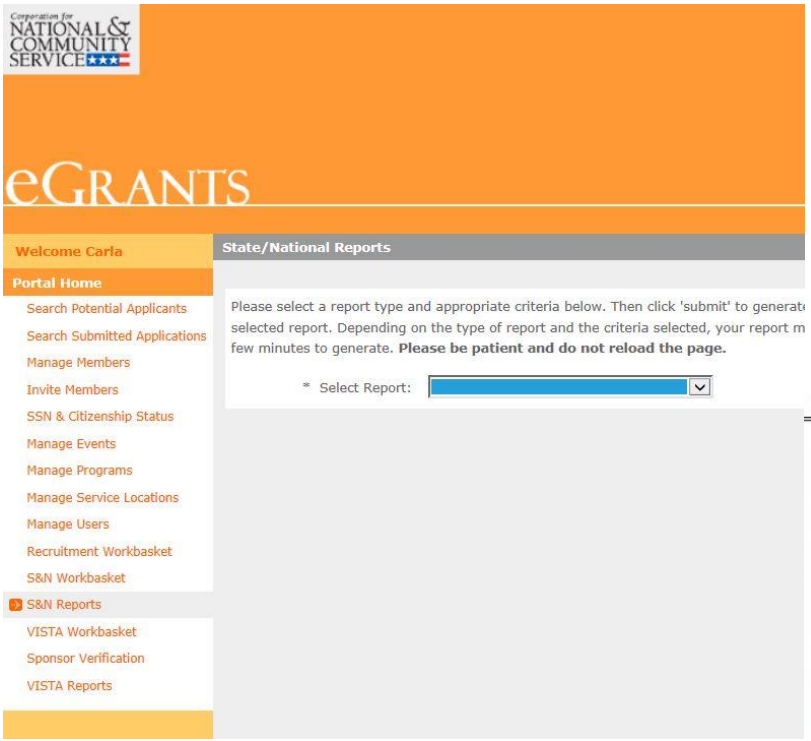
Also see Section

5.8. Member Records (Terms and Conditions, 45 CFR 2522.820) for more information.

G. Enrollment Period

Programs must document in the eGrants/MyAmeriCorps Portal a member's enrollment and exit in a term of service within 30 days of the date of that event. To see how this is done, please reference the Embracing eGrants presentation.

To determine compliance with the 30-day enrollment and exit requirements, use the Enrollment Approval Cycle Time Report and Exit Approval Cycle Time Reports, which are available from the Reports menu in the eGrants Portal. The Reports page in the Portal is pictured below.



ENROLLMENT DATE	ACTIVATION DATE	TOTAL DAYS BEFORE APPROVAL
10/22/2015	10/23/2015	2
09/04/2015	09/23/2015	20
11/05/2015	12/03/2015	29
09/04/2015	09/14/2015	11
09/04/2015	09/14/2015	11
09/04/2015	09/14/2015	11
09/04/2015	09/21/2015	18
11/23/2015	12/21/2015	29
10/24/2015	11/17/2015	25
09/04/2015	09/14/2015	11
09/04/2015	09/14/2015	11
09/04/2015	09/18/2015	15
09/04/2015	09/17/2015	14
09/04/2015	09/21/2015	18
11/05/2015	11/17/2015	13
09/04/2015	10/01/2015	28
09/04/2015	09/25/2015	22
09/04/2015	09/14/2015	11
09/09/2015	09/17/2015	9
10/22/2015	11/20/2015	30
11/05/2015	11/13/2015	9

In these reports, the "Total Days Before Approval" number is used to assess compliance. Thirty-one days, and any number of days less than 31 days, is considered compliant. To understand how 31 days can be considered compliant when the requirement is 30 days, it helps to understand how the Portal calculates this number.

If you were to count the number of days between now (if today is Tuesday) and Saturday, you would count Wednesday, Thursday, Friday, and Saturday—a total of four days. However, instead of counting four days, the Portal includes the current day—Tuesday, Wednesday, Thursday, Friday, and Saturday—a total of five days. Because the Portal adds an extra day to its calculation, 31 days actually means the AmeriCorps member was enrolled or exited within 30 days.

Suspension and exit from service must also be documented in the eGrants/MyAmeriCorps Portal within 30 days of the event. If a member is enrolled or exited past 30 days of that event for reasons entirely beyond the program's control please provide your assigned Program Officer an explanation and documentation.

H. Reasonable Accommodations and Disability Inclusion [Terms and Conditions - Specific IV.C. and 45 CFR 2522.100(h)]

Upon request, programs are required to provide reasonable accommodations for qualified candidates and members with disabilities. Qualified candidates and members may request an accommodation at any time during their consideration and/or term of service.

An offer of the availability of reasonable accommodations should be made verbally and in writing (as prudent AND equally among all members) at the following times:

- When a candidate or member voluntarily discloses his/her disability.
- When any candidate is offered an interview.
- When any candidate is offered an AmeriCorps position.
- Within all member contracts and handbooks.
- During member orientation.
- No less than 48 hours prior to member orientation, meetings, and trainings throughout their term of service.
- When the nature of conversation regarding a member's performance warrants the provision of reasonable accommodations as a solution to the performance issue.

Most reasonable accommodations are low to no cost. Prior to denying any accommodation request, program staff are required to consult with their program officer for assistance in determining whether providing the accommodation presents an undue hardship on the program and making a final determination as to whether an accommodation is reasonable or not.

Programs need to be proactive to ensure that everyone - including individuals with disabilities – have the opportunity to serve and to be active participants. Often managers need more information about accessible and inclusive recruiting or want disability-related information to assists supervisors of members or volunteers with disabilities. It is worth emphasizing that it is not uncommon for programs to have members with mental health impairments.

Programs that have members who are receiving Social Security Income (SSI) and receiving a living allowance through their AmeriCorps service can receive both. Living allowance shouldn't impact SSI eligibility as clarified in the Heart Act. If members are having trouble accessing both benefits, Stephanie Enyart offered to write a letter of clarification to local social security offices so that the Heart act is honored. Social Security Disability Insurance benefits will be affected by receiving a living allowance, however.

Programs with questions about providing reasonable accommodations can refer to:

- Job Accommodation Network (JAN) who will provide free technical assistance on matters related to disability inclusion and providing accommodations.
- Refer to CNCS resources including the 5 great eCourses
- Contact Stephanie Enyart directly with questions on what is a reasonable accommodation

5.2. National Service Criminal History Checks (Regulations 45 CFR 2510, 2522, 2540, 2551 and 2552; Regulations published on October 5, 2012)

Grantees must conduct and document a National Service Criminal History Check on all employees, participants, and others who receive a salary, national service education award, living allowance, or stipend under Corporation grants. **All Wisconsin AmeriCorps program members and staff funded, partially or wholly, by federal funds or shown as match (in-kind or cash) on the AmeriCorps grant (also referred to as "covered positions")** must receive, at a minimum, a criminal history check prior to working or serving any hours consisting of: (1) a nationwide name-based check of the National Sex Offender Public Registry (NSOPW) at www.nsopw.gov, which consists of a web-based check of a centralized system that identifies individuals who are registered as sex offenders in states, territories, or with many federally recognized tribes; and (2) either a name- or fingerprint-based search of the statewide criminal history registry in the candidate's state of residence determined at the time of their application **and** in the state where the individual will serve or work, **OR** a fingerprint-based FBI check (the fingerprint-based FBI check may only be used to replace the statewide checks if the individual does not have recurring access to vulnerable populations as defined in the third paragraph of this section).

Additionally, Serve Wisconsin requires that all AmeriCorps members be checked using the Wisconsin Circuit Court Access (WCCA) system, found at http://wcca.wicourts.gov/index.xsl. This requirement is only for AmeriCorps members, not grant-funded employees. An individual may not serve as and AmeriCorps member prior to completion of the WCCA check.

Lastly, since April 21, 2011, programs have been required to conduct a fingerprint-based FBI check on individuals in covered positions, who have recurring access to children 17 years of age or younger, to persons age 60 or older, or to individuals with disabilities. An individual who refuses to consent to a State criminal registry check or FBI fingerprint check, or who makes a false statement in connection with a grantee's inquiry concerning the individual's criminal history, is not eligible to work in an AmeriCorps grant-funded position or to serve as an AmeriCorps member. Recurring is also defined in section 6.2.C.

For any individual, it is required that the NSOPW and WCCA (members only) check be *completed* before service/work begins, and that the state and/or FBI checks are *initiated* – one more step than getting permission for the checks – no later than the start of service/work. Generally, date of completion is recognized as any official date listed on the results of the check (refer to each individual check's section below for more on completion). It is best practice to complete these checks as soon as possible, well before the individual will be working/serving. This provides a buffer in the event that one of the registries is down, or a state is slow to return the results of a check, for example.

The criminal history check procedure includes the following steps: (a) Verify the individual's identity by examining the individual's government-issued photo identification card, such as a driver's license, and document that you verified identity; (b) Obtain prior, written authorization to perform and review the check; (c) Document the individual's understanding that selection into the program is contingent upon the organization's review of the individual's criminal history, if any; (d) Provide a reasonable opportunity for the individual to review and challenge the factual accuracy of a result before action is taken to

exclude the individual from the position; (e) Provide safeguards to ensure the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant; (f) Ensure that an individual, for whom the results of a required criminal registry check are pending, is not permitted to have access to children, persons age 60 and older, or individuals with disabilities without being accompanied by an authorized program representative who has previously been cleared for such access; (g) complete Serve Wisconsin's *Criminal History Check Verification Form* for each individual after all checks have been completed; and (h) maintain the results of the checks and document that you considered the results when selecting the member. Any variance from the required procedures requires Serve Wisconsin and CNCS approval of an Alternate Search Procedure (ASP). Programs wishing to use an ASP should contact their Program Officer.

For more information from the Corporation regarding criminal history checks go to: http://www.nationalservice.gov/resources/criminal-history-check

NO RECURRING ACCESS –	RECURRING ACCESS –

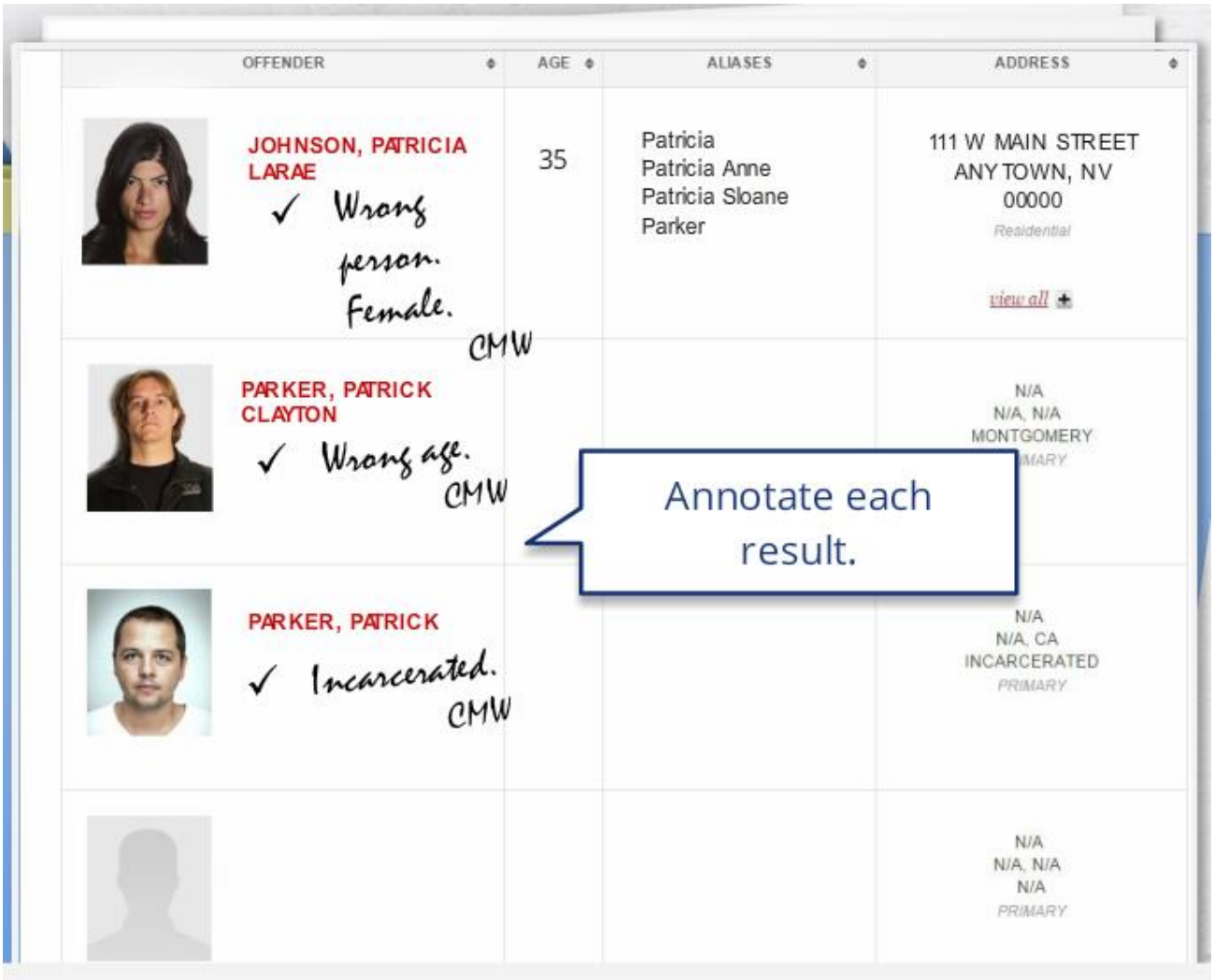
• National Sex Offender Public Website check
  ○ Nationwide search using www.nsopw.gov
  ○ An individual may not serve/work prior to completion of this check
• Statewide criminal history registry check
  ○ State of residence at time of application plus state where the individual will serve or work
  ○ Must use designated statewide repositories or obtain approval for Alternate Search Protocol
  ○ Name or fingerprint-based search
  ○ Must initiate no later than the start of service or work
 	
OR instead of Statewide check
  ○ FBI check - see details at right
  ○ Only can be used instead of Statewide check for individuals without recurring access
 	
AND if an AmeriCorps member
• Wisconsin Circuit Court Access system
  ○ http://wcca.wicourts.gov/index.xsl
  ○ A member may not serve/work prior to completion of this check
	• National Sex Offender Public Website check (see details to left)
	
	• Statewide criminal history registry check (see details to left)
	
	• FBI nationwide Criminal History Record Information check
	  ○ May be self-obtained or adjudicated result from authorized recipient, such as state repository
	  ○ Obtaining FBI check does not substitute for the required statewide criminal history check(s)
	  ○ Must initiate no later than the start of service or work
	
	AND if an AmeriCorps member
	• Wisconsin Circuit Court Access system
	  ○ http://wcca.wicourts.gov/index.xsl
	  ○ A member may not serve/work prior to completion of this check

A. National Sex Offender Public Website Check

There is no cost to conduct this check. Programs must use the http://www.nsopw.gov website to conduct these checks on the person's current legal name (as listed on their government-issued photo identification), any previous names, and any aliases by which the applicant has been known. Programs must maintain a dated screen printout of results. The date shown on the printout indicates when the check was completed. You are required to perform the NSOPW check until all state registries are cleared. The result will indicate whether or not any state systems were inoperable during that search. If the check is not complete, you must continue to re-check the NSOPW before the person starts service to rule out the possibility that the applicant may be registered in the state(s) system(s) that was not connected to the NSOPW system when you performed the first check. You may also supplement the first NSOPW check by checking the state registr(ies) that are out of service. You should pay special attention to the applicant's state of residence and state of service. Until all jurisdictions are checked, an individual is unable to work/serve.

If the search returns results, print out **all of them**. Then click on each result to see if any of these results could be the individual in question. Check information like the photo, age, sex, and place of residence. Each time you are able to determine that one of these results isn't the individual in question, check it off on the printed copy noting how you were able to tell it isn't the person in question, and initial your checkmark. These annotated results are the grant record that you will maintain to show you've verified the person in question isn't in the database.[1] The program is required to document on the print out that the record was considered prior to the individual logging hours even if the check was clear.

[1] Online Introductory Course



B. State Criminal Registry Check

This is a check by name or fingerprint, of the state criminal history registry for the state in which the program operates and the state in which the applicant resides at the moment in time in which the individual applies to serve or work.

While the Corporation does not dictate specifics with regard to documentation for establishing state of residence, programs must ensure that the totality of information is accurate and logical. For example, when a government-issued ID address does not match the indicated state of residence address, programs should document why not. To reduce risk and cases of noncompliance, programs are strongly encouraged to have clear, written policies and procedures establishing protocol for discerning state of residence for all covered individuals, which could be merely be identifying one location on one form for which an applicant's address is listed.

According to NSCHC FAQs 7.12, the state where a candidate resides is the location that the person considers his or her place of residence at the moment in time that he or she applies to serve or work.

Generally, that will also be the candidate's home of record and legal residence, but it may not be. There is no measure of how long the person has resided at a location that a program is required to validate to establish the correct state of residence to check. Even a single day as a resident meets the test for place of residence. Programs may mitigate risk by also checking candidates' legal residence or home of record, but to exclusively use some other criteria the program should seek a written approval from CNCS.

For the purpose of Corporation requirements, an individual applying to serve or work who is an enrolled full-time college student is deemed to be residing in the state where he/she lives for the purpose of attending the school without regard to whether or not that home is on- or off-campus, and whether or not that home is in the same state as the college is located.

Once residency at the moment in time of application is determined, applicants whose residence is in another state must have a criminal records check run through that state's criminal records repository in addition to Wisconsin's. For other state's criminal history registries, go to https://www.nationalservice.gov/sites/default/files/documents/table-of-designated-state-repositories-and-alternates-11-22-2017_508.pdf and https://www.nationalservice.gov/StateCheckGuidance. If the program determines and documents that the applicant was residing in Wisconsin at the moment in time of application, only a Wisconsin state check would be required. In Wisconsin, this is the State Department of Justice check. Information is available at https://www.doj.state.wi.us/dles/cib/background-check-criminal-history-information. Criminal history checks for the state of Wisconsin may be obtained at https://recordcheck.doj.wi.gov/.

These check(s) must be initiated on or before the start of work or service. The "start of work or service" is the first day that hours may be logged for work, service or training. CNCS states that initiation is one step more than getting permission to conduct the checks. This could include fingerprinting, mailing requests to obtain checks to the State repository, having forms for checks filled out by candidates, etc. Serve Wisconsin does not consider scheduling fingerprint appointments to be initiation. Because the State repository criminal history check will vary by state, programs must become familiar with the information provided in the result issued by the state being checked and ensure that dates are listed on any results filed, which would indicate completion, or any documentation used to support initiation of the check. Programs will need to define policies and procedures for every portion of the criminal history check process, especially outlining how checks are initiated and completed.

C. Fingerprint-based FBI Criminal History Record Check

As, of April 21, 2011, programs are required to conduct FBI criminal history checks on covered individuals who will be serving in or working for an AmeriCorps program that gives them recurring access to vulnerable populations (children age 17 and younger, persons age 60 and older, or individuals with disabilities as defined by the ADA). This is in addition to the State Criminal History Check and the NSOPW check. The Corporation defines "recurring access" as "the ability on more than one occasion to approach, observe, or communicate with an individual through physical proximity or other means, including but not limited to, electronic or telephone communication." Episodic access is access that is

not a regular, scheduled and anticipated component of an individual's position description, and is not considered to be recurring.

The FBI check must be initiated on or before a member is enrolled in AmeriCorps and hours are served by individuals serving in a covered position. Again, initiation is one step more than getting permission to conduct the checks. This could include fingerprinting, mailing requests to obtain checks to the State repository, having forms for checks filled out by candidates, etc. Serve Wisconsin does not consider scheduling fingerprint appointments to be initiation. Programs must be able to document how and when checks were initiated. Programs should have policies and procedures outlining how they initiate checks. Results of the check should include the date the check was completed.

Serve Wisconsin offers programs the option of obtaining FBI fingerprinting services through an existing statewide state government contract. Programs are allowed to use a state government contract to access electronic fingerprinting services that will route electronic fingerprints through WI Dept. of Justice for the WI state criminal history check, and on to the FBI for the FBI fingerprint check; the results would be posted to an account the AmeriCorps program has established with WI DOJ.

For the WI DOJ purposes, if a person will receive any type of compensation (e.g. living allowance) for the position being applied for, that person would be considered to be an employee for record check fee purposes; therefore, prospective AmeriCorps members have been considered employees for record check purposes and should designate themselves as needing an "employee" record check when setting up an appointment for electronic fingerprinting.

To access the electronic fingerprinting services under the state contract you will have to contact the contract vendor, Fieldprint, Inc. To let them know that your Wisconsin AmeriCorps program would like to use Fieldprint electronic fingerprinting services, you can contact:

Fieldprint Inc.
400 Lippincott Drive
Suite 115
Marlton, NJ 08053
(877) 614-4364
customerservice@fieldprint.com
http://www.fieldprintwisconsin.com/

D. Wisconsin Circuit Court Access Check

Serve Wisconsin also requires a name check of the Wisconsin Circuit Court Access (WCCA) system. This can be found at http://wcca.wicourts.gov/index.xsl. This requirement is only for AmeriCorps members, not grant-funded employees. An individual may not serve as an AmeriCorps member prior to completion of the WCCA check.

For the check to be complete, the program must maintain a dated screen printout of the results; at minimum, the cover sheet listing the results, if any. Programs are not required to print out all of the

results returned. When deciding whether a result warrants being documented, programs should be considering: (1) their own policies and procedures , (2) whether the result is applicable to the applicant's service, and (3) if the result is both relevant and not included in other checks. Unlike the NSOPW, if you determine a result warranted further documentation, no annotation on the results is required. Serve Wisconsin defines documentation of the check to be printing the WCCA cover sheet and relevant results as described above.

E. Approval of Alternative Search Procedure

If you conduct a criminal history check through an alternate source that meets the federal requirements, or if you would like to request alternative search approval as detailed in the regulations 45 CFR 2540.206, please contact your Program Officer. All alternative search options must be requested through Serve Wisconsin and receive prior CNCS approval, and are used to cover situations where a state in some manner prohibits or inhibits you from following the process or performing the required checks.

F. Supervision of Member While Results are Pending, Accompaniment

Programs are responsible for ensuring that an individual (member or staff), for whom the results of the statewide and FBI criminal registry check(s) are initiated and pending completion, is not permitted to have access to vulnerable populations (children age 17 and younger, persons age 60 and older, or individuals with disabilities) without being accompanied by either (1) an authorized program representative who has previously been cleared for such access; or (2) by a family member or legal guardian of the individual; or (3) an individual authorized by the nature of his/her profession to have recurring access to the vulnerable individual(s), such as an education or medical professional. "Accompanied" means that the member must be in the direct line of site of the person supervising them at all times. Accompaniment may cease when either the FBI or state check(s) have cleared. If multiple state checks are required, all state checks must be complete before ceasing accompaniment. Even during the accompaniment period, accompaniment is not required when the individual does not have access to vulnerable populations. Examples might be when the person is doing office work or is at an off-site training event.

Each instance of accompaniment must be documented, including the date, time, location and name of person who provided accompaniment. Programs must have policies and procedures that clearly describe their accompaniment guidelines and the compliant procedures for documenting accompaniment.[2] Having policies and following them will reduce disallowance instances. Regardless of supervision, programs shall ensure that no member or employee serve hours prior to completion of the National Sex Offender Public Website (NSOPW) and, for AmeriCorps members only, the Wisconsin Circuit Court Access (WCCA) check.

[2] NSCHC Enforcement Guide

One possible way to document accompaniment is to indicate on the covered individual's timesheet who did the accompaniment, on what dates, hours, and have the individual who performed accompaniment incrementally sign off attesting to the accuracy of the documentation. A log of the dates, times and person doing the accompaniment for each instance when an individual was in the presence of a vulnerable populations before either an FBI Check or State Check(s) clear would suffice as compliant accompaniment documentation (see example of accompaniment documentation below). Programs may retain documentation of the qualifications of the person providing accompaniment elsewhere. For example, if one person or category of persons provides accompaniment to all volunteers, you may maintain this in one place for the whole program.[3]

An accompaniment documentation best practice would be to use OnCorps to fulfill the documentation requirements. In the example below, a member has already submitted her timesheet and we are reviewing it from the site supervisor level in OnCorps. The site supervisor has not yet approved or denied the timesheet. After the site supervisor reviews the member's timesheet for its accuracy, she enters the accompaniment log, meaning for each instance of accompaniment, the site supervisor enters into OnCorps the accompaniment, including the date, time, location and name of person who provided accompaniment.

Program directors may use an additional layer of protection in OnCorps by indicating on the members profile (Manage Records → Members → Members → Member Profile) that accompaniment is required. Program directors will select what date accompaniment may cease. By indicating that accompaniment is required, all of the member's timesheets will now show that accompaniment is required for the time period in question.

[3] NSCHC Documentation Checklist

		Training	Service		
Day	Fund raising	Training	Direct Service	Funraising	Total Hours
Fri Sep 16	0	5	3	0	8
Description:	3 hours creating lesson plans 5 hours member meeting and training.				
Sat Sep 17	0	0	0	0	0
Description:					
Sun Sep 18	0	0	0	0	0
Description:					
Mon Sep 19	0	0	0	0	0
Description:					
Tue Sep 20	0	0	0	0	0
Description:					
Wed Sep 21	0	0	7.5	0	7.5
Description:	5 hours recruiting volunteers 1 hour answering emails 1.5 hours tutoring				
Thu Sep 22	0	0	6	0	6
Description:	3 hours data reporting 3 hrs of after school programming				
Fri Sep 23	0	0	6	0	6
Description:	4 hours tutoring 2 hours lesson planning				
Sat Sep 24	0	0	3	0	3
Description:	3 hours volunteering at local Harvest Festival				
Sun Sep 25	0	0	0	0	0
Description:					
Mon Sep 26	0	0	0	0	0
Description:					
Tue Sep 27	0	1	7	0	8
Description:	2 hours tutoring 4 hours recruiting volunteers 1 hour responding to emails 1 hour training - watching webinar				
Wed Sep 28	0	0	5	0	5
Description:	2 hours researching recruitment strategies 3 hours after school programming				
Thu Sep 29	0	0	8	0	8
Description:	4 hours of tutoring 2 hours of paperwork 2 hours recruiting students				
Fri Sep 30	0	0	0	0	0
Description:	sick day				
Totals:	0	6	45.5		51.5

Comments/Description:

Approve/Reject Time sheet(s) (select one)

- (●) I have reviewed and **approve** this Time sheet(s).
- ( ) I have reviewed and **DO NOT approve** this Time sheet(s). (AmeriCorps Member will be notified to correct and re-submit this time sheet)

Comments:

ACCOMPANIMENT LOG

Sep 16: 5 hours of accompaniment (11am-4pm) conducted by Andrea Supervisor at Test Program offices.
Sep 21: 7.5 hours of accompaniment (9-12am, 1-5:30pm) conducted by Andrea Supervisor at Old School House
Sep 22: 3 hours of accompaniment (3:30pm-6:30pm) conducted by Jorge Additional Supervisor at Old School House
Sep 23: 6 hours of accompaniment (8:30-10:30am, 1-5pm) conducted by Jorge Additional Supervisor at Old School House
Sep 24: 3 hours of accompaniment (10am-1pm) conducted by Lindsay Farmer at Playground Park
Sep 27: 6 hours of accompaniment (8-10am and 2-6pm) conducted by Andrea Supervisor and Jorge Additional Supervisor at Test Program office and Old School House
Sep 28: 5 hours of accompaniment (1:30-6:30pm) conducted by Andrea Supervisor at Old School House
Sep 29: 8 hours of accompaniment (8:30am-12:30pm, 1:30-5:30) conducted by Jorge Additional Supervisor and Andrea Supervisor at Old School House

32 characters left

G. Checks for Re-Enrolling Members

Members who serve consecutive terms in a single program with a break of less than 120 days between terms do not require another criminal history check for the additional term. However, if the member will have recurring access to vulnerable populations during his/her consecutive term and did not receive all components for individuals with recurring access to vulnerable populations during the previous term, he/she is required to receive a heightened criminal history check prior to the consecutive term, regardless of the amount of time between terms. A program enrolling a member who has served previously with another AmeriCorps program must complete its own national service criminal history check on the member.

H. Consideration of Criminal History Findings and Member/Staff Acknowledgment

Each AmeriCorps program should develop a written policy about how criminal history checks will be handled at their agency, including timeframe in which checks will be conducted. Specifically, this should cover how the program will evaluate members and staff who have findings on their criminal history check, to determine whether they will serve/work within the program. Programs must obtain written authorization from each member/staff and document that the member/staff:

- has been informed of the national service criminal history check to be conducted,
- gives permission for the program to conduct the check,
- was told of the program policy on consideration of criminal history findings,
- is aware that member/staff participation/work is contingent upon criminal history review and that the member/staff has the opportunity to challenge the results. Challenges may be based on the assertion that there are errors on the report, but not on the program's decision about whether the individual's record disqualifies him/her from service/work in the program.

In addition, it should be clear that the criminal history check results are confidential.

CNCS policies explicitly exclude prospective members/staff from service/work for the following reasons. If the prospective member/staff:

- Is registered, or required to be registered, on a sex offender registry;
- Has been convicted of murder, as defined in section 1111 of title 18, United States Code;
- Refuses to consent to the National Service Criminal History Check, or
- Makes a false statement in connection with a grantee's inquiry concerning the individual's criminal history.

In all other cases, it is the responsibility of the programs to establish guidelines, other disqualifying offenses, and restrictions for consideration of criminal findings that fit with their program design.

I. National Service Criminal History Check Documentation

The program must ensure that it maintains dated hard copy criminal history documentation in a separate and secure file. For NSOPW checks, the program must retain copies of the results of these

checks, and if there are name-based hits, they should be marked to record documentation that the program has verified the candidate not to be one of the registered offenders. For all other checks the documentation must contain dated results of the criminal history check. It must also demonstrate that, in selecting or placing an individual, the program considered the check's results (see H. Consideration of Criminal History Findings and Member/Staff Acknowledgment, above, and the NSCHC Documentation Checklist). The *Criminal History Check Verification Form* must be included in either the member file or in the criminal history check file.

J. Costs Incurred Conducting Criminal History Checks

The cost of conducting criminal history checks is an allowable cost, reimbursable with grant funds. Member and employee applicants do not assume the cost of criminal history checks, unless the Corporation has given written permission to do so.

K. Financial Impact of Failure to Comply

The Corporation has released specific guidance on how disallowance is to be handled for cases of noncompliant NSCHCs. This is detailed in the National Service Criminal History Check Enforcement Guide. More information related to how disallowance is to be applied can be found at http://www.nationalservice.gov/resources/criminal-history-check.

L. National Service Criminal History Check Training (Terms and Conditions, NSCHC FAQs)

All programs **must** complete CNCS NSCHC training every year. The CNCS designated e-course provides a thorough overview of the requirements and can be found at: https://www.nationalservice.gov/reqCHCtraining. Each program must identify at minimum one relevant staff person to fulfill this requirement on behalf of the program. Successful completion of the eCourse will generate a dated certificate for the learner, with an expiration date one year following the date of completion. Maintain this certificate as documentation of completing the required annual training and consider them as grant records. Serve Wisconsin will ask for copies of the completed training certificate(s) at the time of monitoring.

Assign staff to retake the course annually prior to the expiration of the certificate. From the time that the first designated individual at an organization has successfully completed the eCourse, the organization must ensure that at least one individual on staff has an unexpired certification from the eCourse. For example, if an individual in an organization first completes the eCourse on June 1, 2016, either that individual or another appropriate individual within the organization must complete the eCourse again before June 1, 2017.

Though only one individual per grant is required to take this training, CNCS strongly recommends ensuring at least two individuals take the training in every required organization described to mitigate the risk of noncompliance in the event of unexpected absences or staff turnover. Organizations with

multiple grants from CNCS must have one individual per grant take this training, unless one individual has responsibility for managing the NSCHC requirements across all grants.

Organizations subject to this requirement must update their policies and procedures to designate appropriate staff and ensure they complete the eCourse annually and maintain documentation of compliance.

5.3. Program Design – Member Positions, Term Length & Activities (Terms and Conditions)

A. Member Position Design and Final Enrollment Dates

At the beginning of each program year, programs must submit an *AmeriCorps Member Final Enrollment Date(s) Commitment Form*. The form will detail the number of members serving for each position type, final enrollment date and length of term. For example, programs may indicate they have 10 full-time Community Youth Development members serving 12-month terms and 5 full-time School-Based Tutoring members serving 10-month terms (the length of term and classification will vary by program). If a program is not on track to meet their committed Final Enrollment Date for any position type, they must notify their Program Officer and request an extension.

Position types and term lengths should be the same or similar for members who are providing the same or similar service activities. Differences should be based on community need and not on individual member availability. In the example above, this would mean that the program could not enroll 4 School-Based Tutoring members in 10-month terms and 1 School-Based Tutoring member in a 9-month term unless the program could establish that the tutoring activities or the sites' needs differed among the members and these differences required different term lengths. Member period of service must be specified in the member contract. Programs will be expected to enroll the number of members in each of these categories and this will be monitored by Serve Wisconsin through site visits and/or desk reviews as part of the regular monitoring process.

According to section IV.E of the AmeriCorps Terms and Conditions, the grantee must ensure that each member has sufficient opportunity to complete the required number of hours to qualify for an education award. In planning for the member's term of service, the grantee must account for holidays and other time off, and must provide each member with sufficient opportunity to make up missed hours. Programs should plan for all members to finish their terms of service by the end of the original contract date, not 12 months from their start/enrollment dates. Exceptions will be made only for members who have been suspended (an official suspension in the My AmeriCorps Portal) during their term.

Final enrollment dates will be determined based on how the program fills out the *Final Enrollment Date(s) Commitment Form* after receiving their contract. It must be returned to your program officer by the due date will be listed on the form. In addition to establishing enrollment deadlines, the Commitment Form requires that position conversion requests be submitted on or before the final enrollment dates for each position type. For example, if a program's final enrollment date for full-time members is November 1, and the program wants to convert one unfilled full-time position to two half-time positions, the position change request should be submitted on or before November 1 of that same year. For more information on position conversions see section 5.3.D. Changing Member Term of Service (Terms and Conditions IV.E.3 and CNCS Policy FAQ), and section 5.3.E. Unfilled Member Positions/Position Transfer.

The following enrollment deadlines have been created for all member classifications as suggestions (enrollment deadlines were created assuming a September 1 grant start date).

Term of Service	Enrollment Deadline	Final Enrollment Date Suggestions (assuming Sept. 1 grant start date)
Full Time	3 months from grant start date	December 1
Half Time	6 months from grant start date	March 1
Reduced Half Time	6 months from grant start date	March 1
Quarter Time	9 months from grant start date	June 1
Minimum Time	9 months from grant start date	N/A

B. Modification of Program Design - Position Conversion

While it is not recommended, it is sometimes necessary for programs to request to modify their member position configuration. The modifications should be based on community needs, not on individual member recruitment, site recruitment or other extraneous factors. Position configuration modifications are accomplished through a position conversion, and require prior approval from a Serve Wisconsin Program Officer. See the November 19, 2014 *Member Position Conversions & Corrections in My AmeriCorps Portal* guidance memo for more information.

C. Calculating Conversions (Terms and Conditions - Specific VI.B and CNCS Policy FAQ)

Full-Time Fixed-Amount and Professional Corps Fixed-Amount programs are able to convert their full-time positions to enable them to have less than full-time members serving in full-time capacity. All conversions, for all grantees, will be MSY and Trust neutral – the total number of MSYs and education award amounts in the grant may not increase as a result of the position conversion. Programs may also combine and convert less than full-time positions to full-time positions as long as such changes do not increase the total MSYs or total education award amounts awarded in the grant.

1 full-time member (1 MSY and a $5,920 [amounts for 2017-2018] education award) may be converted into 2 half-time positions because the conversion is MSY-neutral (2 members x 0.5 = 1 MSY) and the total education award amount is Trust neutral (equal to or less than the original amount, 2 awards x $2,960 = $5,920). A chart below shows the MSY values by position type:

Term of Service	MSY
Full-time	1.000
Half-Time	0.500
Reduced Half Time	0.3810
Quarter Time	0.2646
Minimum Time	0.2116

One full-time member position may not be converted into 4 quarter-time positions because the conversion is not MSY or Trust neutral, since it increases the total MSY (4 members x 0.2646 = 1.0584 MSY) and the amount of the total education award (4 awards x $1,538.36 = $6,153.44). In this example, the maximum number of allowable quarter-time positions would be three (0.7938 MSY and $4,615.08 education award value).

Some allowable conversions from full-time and half-time positions are:

1 FT position =		**1HT =**
1RHT+2QT	2QT+1MT	1QT+1MT
3QT	1QT+3MT	1RHT
2HT	4MT	1QT
1HT+1QT+1MT	2RHT+1MT	2MT

Note: these examples are conversions **from** one FT or HT position, not **to** one FT or HT position. That is, for example, one QT and one MT position cannot be converted to one HT position, but the converse can be done.

D. Changing Member Term of Service (Terms and Conditions - Specific VI.C and CNCS Policy FAQ)

Requests for changing member term of service (filled AmeriCorps positions) must occur through your program officer. Please contact them immediately if you believe you will need to change the term of service for a filled position. Programs may not change a member's term of service without prior authorization from Serve Wisconsin. eGrants will not allow a program to change a member's term of service unless they have an unfilled position for the position the member is being changed to. For example, if a full-time member is being changed to a half-time position, the program must have an available half-time slot. Once the conversion is finalized, the slot in which the member was serving previously will be become available.

E. Unfilled Member Positions/Position Transfer

In some cases, Serve Wisconsin has the ability to move a program's unfilled member positions to another program(s) within the same prime grant; therefore, Serve Wisconsin expects that all programs will carefully manage their member positions at all times. If programs are not able to fill the awarded positions, they must either request a conversion of the positions prior to the enrollment deadlines or notify Serve Wisconsin when they become aware that they will not be able to fill all of their awarded member positions in any category (FT, HT, etc.). Every effort should be made to notify Serve Wisconsin as soon as possible, in order to allow adequate time for Serve Wisconsin to transfer the positions to another program and for that program to recruit and enroll a member(s). In the case that member positions are moved to another Formula program, associated cost/MSY resources may also be moved to the other grantee. Failure to fill all available member positions will be a factor for consideration of continued funding. It should be reiterated that CNCS expects 100% recruitment and retention for all programs.

F. No-Cost Extensions (Grant Contract Article 5, Agreement Addendum #1, clause 14)

No individual member contract may exceed 12 months. All Wisconsin members (including FT, HT, RHT, QT, and MT) must complete their terms of service within 12 months from the program start date. Serve Wisconsin Grant Agreements cover a 12-month period; therefore, a Grant Agreement extension would be required for any activities beyond that period. Without an extension, any member costs incurred after 12 months from the Serve Wisconsin Grant Agreement start date will not be reimbursed by Serve Wisconsin.

With approval from Serve Wisconsin, programs with one or more members who have been suspended may receive a no-cost extension for the length of the period of suspension(s) or to December 31 in the year of the current program year end date, whichever is the shorter period of time, to cover member support costs only, which could include the living allowance, member health care, FICA, etc. Fixed-Amount grantees may invoice for the hours served by eligible members during the no-cost extension period.

Only in the case of member suspension may a member's service be extended past the program's contract end date with Serve Wisconsin. In order to do so, the program must request a no-cost extension. This should come as a written request to your Program Officer with (1) the name(s) of the members you intended on having serve past the program contract end date because of member suspensions, (2) the length of the suspensions the members have served, and (3) the length of the no-cost extension you are requesting. Your Program Officer will respond once s/he have reviewed your request. To insure that the member is covered by the contract in effect, programs must also be issuing a written and signed amendment to the member contract in order to extend the member's term of service.

No-cost extension requests should be made as soon as possible but no later than the end date of the grant contract.

5.4. Exiting Members and Refilling Positions (Terms and Conditions and 45 CFR 2522.230)

A. Member Exits – Education Award Status & Future Service (45 CFR § 2522.230)

AmeriCorps members may be exited from the program because they have successfully completed their term, because they must terminate their service early due to a compelling personal circumstance, or because they terminate their service early for cause. The exit status of a member determines whether he or she earns an education award and may affect his/her eligibility for future AmeriCorps service. For information related to the procedures around exiting members in the MyAmeriCorps Portal please see Section K. Member Exits – Paper Forms and My AmeriCorps Portal/eGrants

Did the member serve through the contract end date?	Did the member meet the minimum hours requirement?	Did the member perform satisfactorily?	Exit Type	Education Award Eligibility	Future Service Eligibility (Subject to Term Limits)
Y	Y	Y	**Successful Completion**	Eligible for Full Award	Eligible
Y	N	Y	**Cause**	Not Eligible for Award	Eligible- Must Disclose Prior Release for Cause
N	N	Y	**Compelling Personal Circumstances**	Eligible for Partial Award*	Eligible
N	N	Y	**Cause**	Not Eligible for Award	Eligible- Must Disclose Prior Release for Cause
N	N	N	**Cause**	Not Eligible for Award	Not Eligible

* Eligible if the member served at least 15% of the minimum service hours.

B. Member Exit – Successful Completion

Members agree to serve for a certain period of time AND to complete a minimum number of hours during that time period. Members who fulfill these requirements, serving satisfactorily, are exited from the program with a full education award.

Programs may have members who complete assignments and reach the minimum hours requirement in advance of the originally agreed upon service end date (i.e. in less time than proscribed in the approved *AmeriCorps Member Final Enrollment Date(s) Commitment Form* submitted to the Serve Wisconsin at the beginning of the grant year). These members will earn a portion of the living allowance based on the portion of the service term that was successfully completed. For instance, a program that has a 12-month program design and has a member that completes the term of service (with program approval) in

11 months will provide the member 11/12 of the living allowance. The member is eligible for the full value of the education award (if he/she performed satisfactorily and met the goals of his/her term of service). Refer to Section Distribution, for more information on living allowances.

Members must receive a final evaluation certifying that they meet the requirements for a successful exit with a full award. Programs must change the member status to Exited in OnCorps and need to exit the member in the eGrants/MyAmeriCorps Portal within the 30-day deadline, and must maintain records documenting satisfactory completion of program requirements. The total hours completed entered into the Portal must match the total approved hours in OnCorps, always rounded down to a whole number. No prior approval is required in order to exit members who successfully complete their term.

C. Member End Date

Under no circumstances should members continue serving beyond their member contract period or the program's grant agreement period. This is for the protection of both the member and the program. Members serving beyond the program's 12-month member contract period will not be covered by a member contract (and are technically not members), and therefore raise many liability and safety issues for members, the public, and the program. Hours served outside of a fully executed member contract and/or grant agreement can be disallowed in case of audit, resulting in repayment of federal funds.

D. Early Termination for Compelling Personal Circumstances (AmeriCorps State and National Policy FAQs)

Members may be released early from their term of service if the program determines that the member cannot complete his/her term due to compelling personal circumstances beyond the member's control. The grantee is responsible for determining and documenting compelling personal circumstances. The Corporation and its auditors may review these circumstances as part of their oversight and monitoring responsibilities.

Programs must receive Serve Wisconsin approval before exiting a member for compelling personal circumstances for employment. Compelling personal circumstances exits with education award will be reviewed through program monitoring activities. See 45 CFR § 2522.230(a) for specific examples of what does and what does not constitute a compelling personal circumstance. Members released for compelling personal circumstances qualify for a pro-rated education award if they have served at least 15% of the service term, and the position is not available to be refilled.

One type of exit for compelling personal circumstances that requires more documentation to be sent to Serve Wisconsin is for member employment – see the related compelling personal circumstances due to employment Guidance Memo on Basecamp. If an AmeriCorps State program includes in its approved objectives the promotion of employment among its members (i.e., such an objective is described in the narrative of the AmeriCorps grant), the program director will be allowed to release a member participating in a 900-hour or 1700-hour term of service for a compelling circumstance (and thus grant the member a prorated award) if the program director determines that the member has been offered a "acceptable" employment opportunity. Similarly, if a member is a welfare recipient and is able to obtain

a job that will get him or her off welfare, the program may deem his or her early departure from a program as a compelling personal circumstance. Members must have served at least 15% of their service term in order to be eligible for a pro-rated education award under these circumstances.

The program director must consult with its program officer before granting a member a prorated award for a compelling circumstance related to employment. In considering a request, the program officer will review the following to determine if doing so is in the member and program's best interest:

- The member must inform the program director about the job opportunity before making the decision to take the job. Specifically, the member must inform the program director about the new job opportunity at least one week prior to the start of the new job. This requirement must be included in the program's member contract, or in an addendum to the contract. This gives the program director the chance to discuss with the member all of the options available. It may be a good idea to have the site supervisor participate in this discussion.
- A prorated award should not be granted to a member who disappears (i.e., stops showing up at his/her service site) and then reappears announcing that he/she has a new job. There needs to be a clear line of communication between the program director, the site supervisor, and the member.
- The new job must be an acceptable, quality job for the member. The new job must help the member advance his/her career. A job at a fast food restaurant or delivering pizza may not be a quality or career-advancing job for many members.
- If there is a compelling financial situation that necessitates that the member takes a higher paying job, the program director may be able to release the member for a compelling circumstance whether or not the program has an approved objective regarding the promotion of employment among its members. For example, this may occur if a member is transitioning out of foster care. 45 CFR 2522.230 says that a compelling circumstance must be beyond the member's control. If the member is having problems making ends meet because of poor budgeting, the program director should consider whether the member may be able to stay in his/her AmeriCorps position and find a second job. Many members regardless of their financial situation find that they need to take on a second job.

As with any prorated award, the program director must document in the member's file the compelling circumstance. The following describes the documentation that is required:

1. The program director must have the member (and his/her legal guardian if applicable) sign the *Serve WI CPC—Employment Form,* which certifies that:

- The member is leaving his/her term of service early to take a job that will advance his/her career.
- The member understands that he/she will be granted a prorated AmeriCorps education award based on the number of service hours that he/she completed as of his/her exit date (if he/she has completed at least 15% of his/her hours).
- The member understands that if his/her new job does not work out, he/she may not able to return to the same AmeriCorps position that he/she vacated. The program director may consider the individual for another vacant position:
    - If the member is still eligible for an additional term of service;

- If one is available; and
- If the program director deems that the member will be able to successfully complete an additional term of service.

2. The program director must also keep written documentation in the member's file that verifies that the member was actually offered the job in question, such as a signed offer from employer.

The program director should document an explanation as to why this job was a compelling employment option for the member (may include the employment barriers the member has faced previously, whether the member was unemployed before beginning AmeriCorps service, whether the member is transitioning from welfare to work, the nature of the position offered, etc.).

If you have any questions about what is acceptable documentation for a compelling personal circumstances exit, please speak with your Serve Wisconsin Program Officer.

E. Early Termination for Cause

Members are released for cause if they do not successfully complete their term of service, for any reason that does not qualify as a compelling personal circumstance. Also, all members who complete less than 15% of their term of service must be released for cause in eGrants/MyAmeriCorps Portal. Members exited early for cause are not eligible for an education award.

It is possible for a member to be terminated from the program for cause and still receive a satisfactory performance evaluation. In these cases, the member would be eligible for subsequent AmeriCorps term(s) of service, as long as he/she performed satisfactorily during the term of service from which he/she was released for cause. Any individual released for cause is required to disclose the release when applying for any subsequent term of service. Failure to disclose past exits for cause will render an individual ineligible to receive the AmeriCorps education award, whether or not that individual successfully completes the subsequent term of service. Members released early from service for disciplinary action are not eligible for future terms of service.

Programs should have a disciplinary policy that outlines program rules about when/how members may be terminated for cause. All rules about termination must be included in the member contract.

F. Documentation of Early (Cause and Compelling Personal Circumstance) Member Exit

Full documentation of the reasons for any early exit must be maintained in the member's file. Programs must ensure that member timesheets are up to date and that an End-of-Term Evaluation is completed prior to terminating a member.

G. CNCS Member Exit Survey

When a program enters a member's start date, eGrants defaults to an expected completion date that is one year from the start date. This date cannot be changed. The member exit form in the Portal becomes available 60 days before the expected completion date, and at that time the member exit survey also

becomes available to the member through a separate link in the Portal. This timing does not always work for programs with members serving less than full-time, who may complete their service well before the expected completion date. Whenever possible, these programs should make the exit survey available to members before they complete the exit process. The solution for these programs is to unlock the exit form in the Portal. Unlocking the exit form makes the exit survey link available to the member and sends the member a reminder to complete the survey. Programs do not have to exit their members at this time, but making the exit survey available to them will help increase response rates. See the *Embracing eGrants* document for step-by-step instructions on how to unlock the exit form in the Portal.

H. Confidentiality of Member Early Exit Rationale

Information in the member records, especially related to reasons why members must be exited early from their program, may be sensitive and confidential. Serve Wisconsin staff and contractors are aware of this requirement and will maintain confidentiality by not disclosing information except to another authorized person as allowable under federal and state law.

I. CNCS Refill Conditions

The following conditions, established by the Corporation, must be adhered to by all AmeriCorps programs regarding refilling of member positions vacated by members who exit early:

- Programs may replace any member who terminates service before completing 30% of his/her term provided that the member who terminates is not eligible for and does not receive a pro-rated education award.
- Only fully enrolled member service categories may be refilled. For example, you may only refill a full-time position if all of your other full-time positions are filled.
- Programs may not refill the same position more than once.

J. Suspension of Ability to Refill by CNCS

The Corporation will suspend refilling for all AmeriCorps programs nationwide if either:

i. Total AmeriCorps enrollment reaches 97% of awarded positions.

ii. The number of refills reaches 5% of awarded positions.

Suspension of ability to refill typically occurs near the end of the Serve Wisconsin AmeriCorps program year.

K. Organizations Ineligible to Refill

Grantees that have special grant conditions under 45 CFR 2543.14 or 2541.120 are not eligible to refill positions. (These are programs that have a history of poor performance, are financially unstable, have inadequate management systems, have not complied with previous grant awards and/or not otherwise responsible.)

5.5. Member Leave or Suspension (45 CFR 2522.230, 2540.220, and 2540.230)

A. Member Suspension Process (National Policy FAQs, AmeriCorps Terms and Conditions)

i. Determine suspension to be the appropriate course of action

ii. Notify your assigned Serve Wisconsin Program Officer. Include an explanation, along with the expected start and end date of the suspension.

iii. Suspend the member in OnCorps and eGrants

iv. Document the suspension in the member's file

v. Make changes to the member's benefits when appropriate

a. Living allowance

- Suspended members are not eligible to receive any living allowance payments while in suspension. – PD Handbook
- Members who are suspended for compelling personal circumstances and later return are eligible to receive the living allowance that they were not afforded during their suspension by serving the remaining term of their contract. They may not receive a lump sum payment.
- Members who are suspended for minor disciplinary reasons may not receive a living allowance for the suspension period. - FAQs

b. Health care

- Members who are suspended for disciplinary reasons are not eligible to receive health and child care benefits.
- The grantee must notify the Corporation's designated agents immediately in writing when a member's status changes, such that it would affect eligibility for childcare or health care. Examples of changes in status are converting a full-time member to less than full-time member, terminating or releasing members from service, and suspending members for cause for lengthy or indefinite time periods. – FAQ D.5

c. Child care

- The grantee must notify the Corporation's designated agents in writing within five business days when a member's status changes, such that it would affect eligibility for childcare or health care. After five days, the recipient will be liable for any erroneous payments made to a childcare provider for an AmeriCorps member ineligible to receive AmeriCorps childcare benefits. Examples of changes in status are cases in which a member faces charges of a violent felony

or controlled substance charge, and suspending members for cause for lengthy or indefinite time periods.

- Members are not eligible for benefits while under suspension. However, if a member is put in a temporary suspended status and meets all of the below requirements, that member may be eligible to receive up to 12 consecutive weeks of continued benefits:
    1. The Member may not be suspended for cause and/or other disciplinary actions (an example of a qualifying suspension would be if a member was given a temporary suspension under the Family Medical Leave Act)
    2. The Member must intend to return to service;
    3. Member must certify he/she needs the continued benefit in order to be able to return to service.[4]
- Program directors should contact the AmeriCorps child care providers on child care related changes, and their health insurance provider about health insurance related changes.

vi. Upon the member's return, OnCorps will create all of the timesheets that were not created during the member's suspension. Members or site supervisors must enter a comment in the timesheet noting that the member was suspended during a portion or the entirety of the timesheet.

Under no circumstances may any member under suspension be allowed hours toward their term of service.

B. Family and Medical Leave

For the limited purposes of the Family and Medical Leave Act of 1993, AmeriCorps may be considered eligible employees of the program sponsor. Participants in Federal programs operated by the Corporation or by another Federal agency will be considered Federal employees for the purposes of the Family and Medical Leave Act if the participants have completed 12 months of service and the program sponsor is an employing agency as defined in 5 U.S.C 6381 et seq.; such participants therefore will be eligible for the same family and medical leave benefits afforded to such Federal employees.

C. Disciplinary

Programs must suspend members facing official charges for violent felonies, for selling or distributing controlled substances, or members convicted of possession of controlled substances. Members may be suspended for disciplinary reasons, for failing to uphold the service requirements and standards of conduct agreed upon in the member contract.

D. Grievance

Members who file a grievance challenging their release for cause must also be suspended.

[4] 2017.02 ASN Childcare Eligibility Benefit Update

E. Compelling Personal Circumstances

Members may also be suspended temporarily for compelling personal circumstances, such as an accident or serious illness. Programs should have a suspension policy in place and conditions that justify member suspensions should be outlined in member contracts. The same requirements pertain to suspension as they do for early member exit, for example, members should not be suspended to serve a summer internship, study abroad or take an extended vacation.

F. No Hours Served in a Pay Period

Situations in which a member serves zero hours during a pay period should be rare and the member should be suspended if there are periods in which no service is performed. One hour or more of service should be conducted each pay period. Otherwise, since the living allowance is to be distributed evenly over the service period, members who do not serve any hours in a pay period, but are not suspended either, should receive a living allowance payment; however, a member's agreement could also stipulate conditions under which the living allowance is paid and what the member should do if a period occurs in which no hours are served.

Some programs allow a member to serve *incidental* hours during periods where service is not taking place, such as during holiday breaks, school year breaks, etc. AmeriCorps service must provide a direct benefit to the community where it is performed, and programs must develop service opportunities that are appropriate to the skill levels of the participants that demonstrate a benefit to the community. There may be service that is not a direct benefit to the community, but are critical to the program's provision of service that benefits the community (45 CFR § 2520.20). For example, attending opening or closing ceremonies could be acceptable incidental service.

Programs that choose to allow incidental service hours must include language in their AmeriCorps grant application that details the circumstances under which a member is able to count incidental hours towards their term of service. An example of this language is:

> *Our AmeriCorps members will [also] be provided the opportunity for occasional service outside the focus of this program in order to better understand and benefit their community and to participate in National Days of Service. These hours may be counted towards the member's term of service if they do not interfere with their normal service hours or conflict with prohibited activities, the service is approved by the member's supervisor [and/or] program director, and the supervisor of the service activity signs an agreement certifying the service and hours performed.*

It is in the program's best interest to draft detailed policy regarding the total amount of incidental service that can be performed and how to obtain permission and document hours served during this time. Incidental service approvals by the program should be reasonable and equitable for all members (e.g. a program should refrain from approving incidental hours for a member who is behind in hours but not allow that same opportunity to someone who is on track to complete). All incidental service is still subject to the rules on prohibited activities.

When a member is providing incidental service that is not related to their program but counted towards their term of service, the member must wear their AmeriCorps service gear.

5.6. Standards of Conduct & Member Disciplinary Policy (45 CFR 2540.310)

All AmeriCorps State programs must develop standards of conduct that are communicated to members within the member contract. These standards inform members of the expectations that programs have of them, such as that members will complete duties as assigned, submit reports on time, follow service site dress code, etc.

In order to deal with behavioral, attendance, or other disciplinary problems that may arise when members do not adhere to the program's standards of conduct, all programs are required to institute a written member disciplinary policy. Members must be advised of the procedure and potential disciplinary actions within their member contracts. Disciplinary policies must outline the steps that may be taken and the authority (site supervisor, program director) responsible to document and/or order such steps. Possible disciplinary actions may include verbal and written warnings, temporary suspensions, or termination.

Any disciplinary actions taken must be fully documented in the member file.

5.7. Member Benefits (NOFO/RFP, Terms and Conditions and 45 CFR 2522.240-45 CFR 2522.250)

All members are should be informed of their eligibility for AmeriCorps benefits such as the living allowance, health care, student loan forbearance, and childcare. Information about member benefits should be included in the member contract. If any member waives a program benefit, the program must maintain proper documentation of the waiver in the member file.

A. Living Allowance (Terms and Conditions - Specific VIII.A, B, and 45 CFR 2522.240)

Programs must provide members a living allowance that falls within the minimum and maximum amounts established each program year listed no later than at the time of grant award. Exceptions to the living allowance minimums and maximums exist for programs established prior to September 21, 1993 and for Professional Corps programs. Although Education Award and Full Time Fixed-Amount Grantees do not include member living allowance amounts in their approved budgets, they are still bound by the limits.

i. **Distribution**

Member living allowances are distributed to members evenly throughout their term based on the program design. Under no circumstances should a member's living allowance increase or decrease during their term of service. A member who starts their term of service in the middle of a pay period and serves hours in that pay period should be paid the full living allowance payment for that period. All member living allowance payments must be recorded in the program's general ledger.

Living allowances are not an hourly wage. Distributions for members will vary depending on the length of their service agreed upon in their member contract. For example, if full-time members are required to serve their terms in 10 months, the program must pay at least minimum living allowance (e.g. $13,732) over ten months. If a program's 300-hour members are required to complete their terms in 3 months, the program must disburse the full living allowance (e.g. $2,560) over three months. If a member does not complete his/her term of service within the amount of time designated, and the program extends the member's term, the member must complete his/her service hours with no additional living allowance payments. See table below for more situational examples.

Member Situation	Length of Service	Amount per Month	Total Living Allowance Provided
Member A starts and finishes on time	10 months	$1,210	$12,100
Member B starts on time and finishes one month early	9 months	$1,210	$10,890
Member C starts late and finishes late	10 months	$1,210	$12,100
Member D starts on time and finishes one month late	11 months	$1,210	$12,100
Member E starts one month late and finishes on time	9 months	$1,210	$10,890

Source: Financial and Grants Management Institute. (2012). *Round Robin: AmeriCorps: Living Allowance Distributions, Handout 1.*

ii. Payment Amounts

Member living allowances are to be consistent and based on the cost of living, not individual circumstances such as one program site having more money to pay members than another. With Serve Wisconsin approval, a program may pay an increased amount only on the basis of increased living expenses such as food, housing, or transportation and keep documentation of the reasons for variance in living allowance rates within member files.

iii. No Hours Served in a Pay Period

Please refer to section F. No Hours Served in a Pay Period above.

iv. Taxes

The living allowance is taxable as income both in Wisconsin and at the federal level. Programs are responsible for setting up their payroll systems to account for FICA.

B. Workers' Compensation (Terms and Conditions - Specific VIII.C.4)

Although under federal law members are not considered "employees" for purposes of the program, federal law appears to provide an exception for workers' compensation purposes. Wisconsin requires that all AmeriCorps members are covered by the agency workers' compensation plan for service-related injuries. Costs incurred providing workers' compensation for members is an allowable cost to the grant. Guidance from Wisconsin's Division of Worker's Compensation regarding Worker's Compensation for AmeriCorps members can be found in Chapter 10, and on Basecamp under Program Resources, Financial Guidance.

i. Serious Member Injury or Death (Terms and Conditions - Specific V.G)

The program should notify their program officer in writing of any serious injury or death occurring to an AmeriCorps member during their service. Written notification is required and should be provided to your program officer within 48 hours of being informed of the injury or death. Please see Section Members that Leave without Completing Exit Process, for what procedures must be taken following such an event in the MyAmeriCorps Portal.

C. Unemployment Insurance

According to Wisconsin State Statute 108.02(15)(j) 7. AmeriCorps members are not considered employees for the purposes of unemployment insurance coverage, with the exception of Professional Corps members. Therefore, members should not be listed on the agency/organization quarterly employee listing for the purposes of unemployment insurance coverage. If you do include the members on your unemployment report, you run the risk of losing an unemployment ruling and being forced to pay unemployment to a former member. Federal funds cannot be used for any member unemployment claims. For more information, please see page 48 of the Unemployment Insurance Handbook for Employers. See also: 8.4. Unemployment Insurance State Statutes

D. AmeriCorps Health Care Policy (Terms and Conditions -Specific VIII.D)

Except for EAPs, Professional Corps, Partnership Challenge awards, or members covered under a collective bargaining agreement, AmeriCorps programs must provide, or make available, a health plan to 1700-hour full-time members who are not otherwise covered by a healthcare policy at the time the member begins his/her term of service. The program must also provide, or make available, healthcare insurance to members serving a 1700-hour full-time term who lose coverage during their term of service as a result of service or through no deliberate act of their own.

Programs are able to offer health insurance to less-than-full-time members serving in a full-time capacity. For purposes of this provision, a member is serving in a full-time capacity when his/her regular term of service will involve performing service on a normal full-time schedule for a period of six weeks or more. The plan must meet the AmeriCorps health care standards detailed in the Terms and Conditions.

AmeriCorps programs purchasing their own health insurance for members must ensure plans are minimum essential coverage (MEC) and meet the requirements of the Affordable Care Act. On May 2, 2014 the U.S. Department of Health and Human Services (HHS) announced a Special Enrollment Period (SEP) for members in AmeriCorps State and National programs, who are not provided health insurance options or who are provided short-term limited-duration coverage or self-funded coverage not considered MEC. Members in the AmeriCorps State and National programs and their dependents in the Federally-facilitated Marketplace (FFM) are eligible to enroll in Marketplace coverage when they experience the following triggering events:

- On the date they begin their service terms; and
- On the date they lose any coverage offered through their program after their service term ends. (Source: 45 CFR § 155.420(d)(9)).

Members have 60 days from the triggering event to select a plan. Coverage effective date is prospective based on the date of plan selection. A copy of the HHS Notice, which provides instructions on how to activate the special enrollment period, is available at https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/SEP-and-hardship-FAQ-5-1-2014.pdf. Members can also visit healthcare.gov for additional information about special enrollment periods: https://www.healthcare.gov/coverage-outside-open-enrollment/special-enrollment-period/.

If coverage is being provided via the Healthcare Marketplace, and thus third party payment is not an option, programs must develop a process to reimburse members for monthly premiums. Reimbursements for health insurance premiums are considered taxable income for the member, and programs must have a way to document such reimbursements. Serve Wisconsin is aware of carriers currently available in Serve Wisconsin, though does not endorse any. Programs that learn of additional vendors are encouraged to share this information with Serve Wisconsin. It is the grantee's responsibility to enroll members into a health care coverage program at the beginning of the service term and to notify the health care coverage provider of any changes in the group enrollment during the program year.

Costs assumed providing health care for full-time members are allowable, reimbursable with grant funds. CNCS will not cover healthcare costs for dependent coverage.

For purposes of the employer shared responsibility Terms and Conditions of the Affordable Care Act (colloquially known as the "employer mandate" or the "large employer rule"), AmeriCorps members are not employees of the AmeriCorps grantee where they serve. IRS Bulletin No. 2015-52 (page 900) states:

> Question: Is an AmeriCorps member providing services to a grantee receiving assistance under the national service laws an employee (of either AmeriCorps or the grantee) for purposes of the employer shared responsibility Terms and Conditions of 26 U.S.C. § 4980H?
>
> Answer: No. The National and Community Service Act provides that participants in AmeriCorps programs are not considered to be employees of the grantee receiving assistance under the national service laws through which the participant is engaging in service (42 U.S.C. § 12511(30)(B)). . . . For purposes of 26 U.S.C. § 4980H, participants in the AmeriCorps programs are not employees of the grantee receiving assistance through AmeriCorps for which the participant is providing services.

According to CNCS, the rule stated in the NCSA (42 U.S.C. 12511(30)(B)) that "[a] participant shall not be considered to be an employee of the organization receiving assistance under the national service laws through which the participant is engaging in service" fully answers any question about the status of member for Affordable Care Act purposes.

- Specifically, this would mean that AmeriCorps programs are NOT to count members when determining the number of employees they have under the employer mandate Terms and Conditions of the ACA.
- Additionally, this would mean that AmeriCorps programs to NOT fill out 1095-C forms for the Members serving in their programs.

More information about Health Care Coverage Options can be found on the Corporation's website.

i. Providers

The Corps Network

Serve Wisconsin maintains membership in The Corps Network, which allows any AmeriCorps State program funded through Serve Wisconsin to access member health coverage.

The broker for the Corps Network plan is Willis of Seattle. Please contact the benefits team at (800) 456-1415, or through their website at www.corpsnetwork.org.

Health Insurance Marketplace

AmeriCorps members may be eligible to obtain health care coverage through the Health Insurance Marketplaces. Members may also qualify for financial assistance to lower the costs of insurance. In some cases, insurance may be available with no monthly premium. Learn more at

HealthCare.gov or read the AmeriCorps State and National Member Health Care Q & A. Programs must develop a policy and process for implementation of their health care policy. The process, at a minimum, must require sufficient documentation (invoice, cancelled check, print off from the system showing they are enrolled, etc.) to demonstrate that the member has health coverage.

ii. Documentation of Waiver and Alternate Health Care Coverage

Within the member file for each full-time or eligible part-time member, the program shall maintain either a copy of the member's health care enrollment or a signed form certifying that the member has alternate coverage and is declining health care coverage.

Programs need to provide/make insurance available to eligible members and should keep documentation that they completed this required step. See Section G. Member Benefits, for more information regarding documentation.

iii. Use of an Alternate Health Care Provider

Programs may use alternate health care coverage vendors that are not listed above, but they must ensure that the coverage meets the AmeriCorps requirements detailed in the Terms and Conditions. If you are unsure whether an alternate plan meets AmeriCorps requirements, you should contact your program officer.

E. Childcare (Terms and Conditions and 45 CFR 2522.250)

The grantee must ensure that childcare assistance is made available to those full-time members who need such assistance in order to participate. Members are eligible if, at the time of acceptance into the program, the member is not currently receiving child care assistance from another source, including a parent or guardian, which would continue to be provided while the participant serves in the program. Please refer to 45 CFR 2522.250 for more information regarding eligibility to receive childcare. Programs whose members are income eligible and have qualified dependents may access childcare by working directly with the Corporation's national childcare provider, GAP Solutions Inc. (GAPSI), without prior Corporation approval. See http://www.americorpschildcare.com/ for more information on how to access this assistance.

This benefit is provided by the Corporation, meaning it does not come out of the program's budget. If a member decides to utilize this benefit, the program must maintain all documentation in the member's file. All full-time members must sign a waiver of this benefit if they decide not to utilize it. A copy of this enrollment or waiver must be included in each full-time member's file.

Programs may provide childcare benefits to less-than-full-time members serving in a full-time capacity, but they are not required to do so.

While it is the member who has the direct benefit with GAPSI, as stipulated in the AmeriCorps Terms and Conditions, programs must notify in writing CNCS's designated agents within five business days after member's status changes in a manner that affects the member's eligibility for childcare. Examples of changes in status include: changes to a member's scheduled service so that he/she is no longer serving

on a full-time basis, terminating or releasing a member from service, and suspending a member for cause for a lengthy or indefinite time period. GAPSI can be contacted directly at americorpschildcare@gapsi.com – the only information they require is the member's name and status change.

Programs should make this part of their regular member management plan. Using the Member Management Start-Up spreadsheet/checklist is a great way to ensure that it happens. Programs may use the AmeriCorps Childcare Program Member Update form to notify GAPSI and document that notification.

Lastly, GAPSI's contact information is:

ATTN: AmeriCorps Childcare Program
12054 North Shore Drive
Reston, VA 20190

Telephone: Toll-Free Number - (855) 886-0687
Email: AmericorpsChildCare@gapsi.com
Fax: 1-800-521-5415

F. Student Loan Deferment and Forbearance

National service members have options for how to deal with their student loan payments during service. Members request deferment and/or forbearance through the eGrants/My AmeriCorps Portal. To access and complete forms for forbearance or interest accrual payment, the member must be registered at https://my.americorps.gov/mp/login.do. Program directors should be cautious about promising these benefits to members because lending institutions have latitude in deciding whether they will grant these statuses depending on the type of loan, whether it has been consolidated, and a number of other factors. Loans already in forbearance cannot be switched to forbearance due to AmeriCorps service, and are not eligible for the interest accrual payment option. If there are questions, the member should work directly with his/her lending institution to determine whether he/she qualifies.

i. National Service Loan Forbearance

Under the National and Community Service Trust Act of 1993, borrowers serving in approved national service positions qualify for mandatory forbearance during their terms of service. This mandatory forbearance allows borrowers to delay payments temporarily. Mandatory forbearance for approved national service positions is available for the following educational loans: Federal Family Education Loans (Subsidized and Unsubsidized Stafford Loans, Supplemental Loans To Students (SLS), Consolidation Loans), William D. Ford Federal Direct Student Loans (Direct Subsidized and Unsubsidized Stafford/Ford Loans, and Direct Consolidation Loans), Federally Insured Student Loans (FISL), Health Education Assistance Loans (HEAL), Health Professions Student Loans (HPSL), Loans for Disadvantaged Students (LDS), Nursing Student Loans (NSL), and Primary Care Loans (PCL). During the time members are serving in a national service position, interest will continue to accrue on their loan(s). Upon

successful completion of their national service term, CNCS will pay all or a portion of the interest that accrued during the time period served. If members leave for reasons other than compelling personal circumstances, they will be responsible for payment of interest and, if not paid, it may be capitalized depending on the type of loan.

ii. Economic Hardship Loan Deferment

Less commonly, national service members may be eligible for deferment on qualified student loans for reasons of economic hardship during the member's term of service. For subsidized Stafford loans, interest does not accrue during deferment. For unsubsidized loans (including unsubsidized Stafford, Graduate PLUS, and Parent PLUS), the interest accrues and is capitalized at certain times, and the member is responsible for paying it. Many members meet their lenders' requirements for deferments based on economic hardship, regardless of whether their loans are federally approved or not. However, interest may still accrue on loans in deferment, especially those that are unsubsidized. Additionally, some lenders may set limits on the number/length of time that loans may be placed in deferment. For private student loans, deferment eligibility is based on loan type.

G. Public Service Loan Forgiveness (PSLF) and Income-Based Repayment (IBR)

As an alternative to putting qualified student loans into forbearance or deferment, members serving in a full-time AmeriCorps position may be eligible to count the regular student loan payments made during their service toward the PSLF program. Members may elect to participate in the IBR plan in order to make their loan payments more affordable during service. Additionally, loan payments made using the Segal Education Award may count toward PSLF, even if the loan(s) are put into deferment or forbearance during service. The PSLF program allows an exception for AmeriCorps alums to make a lump sum payment using the AmeriCorps Segal Education Award and receive credit for up to 12 qualifying payments for PSLF. The number of payments for which a member will receive credit is determined by dividing the amount of the lump sum payment by the scheduled full monthly payment amount, (but members may not receive credit for more than 12 monthly payments toward the PSLF payment requirement). See https://studentaid.ed.gov/sa/repay-loans/forgiveness-cancellation/public-service for reference. The Consumer Financial Protection Bureau website may also have helpful information; on the home page enter "Public Service Loan Forgiveness" in the Search box.

H. Segal AmeriCorps Education Award

i. Award Basics and Amount

Members who successfully complete their terms of service are eligible for an education award; members who exit early for compelling personal circumstances may be eligible for a pro-rated education award if they complete at least 15% of their term of service. The amount of the Segal AmeriCorps Education Award is tied to the maximum amount of the U.S. Department of Education's Pell Grant. Since the maximum amount of Pell grants can change from year to year, so can the dollar amounts of education awards. Programs should check the NOFO/RFP that applied to that program year for corresponding education award amounts. Information about

the Segal AmeriCorps Education Award can be found at http://www.nationalservice.gov/programs/americorps/segal-americorps-education-award.

ii. Education Award & Term Limits (42 U.S.C. 12601-12604, 12606 PART 2526 – Eligibility for an Education Award)

Members may not receive more than an amount equal to the aggregate value of two full-time education awards. The "value" of an education award received is calculated based on its proportion to the full education award in the year the award was approved. An individual who, based upon the aggregate value of education awards previously received, is not eligible to receive the entire award amount offered for a term of service, will instead receive the portion of the education award that he or she is eligible to receive.

Individuals who have received a transferred education award must count the value of that education award when determining the education award amount they are eligible to earn through his/her own service (i.e. a member whose grandmother transferred to him/her a 0.5 value education award can only earn up to 1.5 education awards through his own service). See Transferability (42 U.S.C. 12601-12604, 12606 PART 2530 – Transfer of Education Awards) for more information.

Members may serve additional terms of service even if they have reached the limit of two full-time education awards. Members may serve up to four terms in AmeriCorps State & National, three terms in AmeriCorps VISTA (including VISTA Summer Associates), and two terms in AmeriCorps NCCC.

iii. Using the Education Award

The education award can be used to pay education costs at qualified institutions of higher education (i.e. tuition, fees, etc.), to pay for educational training (i.e. non-degree programs such as technical or vocational training), and to repay qualified student loans (generally federal student loans, NOT private loans). Members can make payments from their award in full or in part and can take up to seven years after their term of service has ended to use their award. Individuals who receive a transferred award have 10 years from the date in which the transferring individual earned the award to use it. Members will manage their education awards through the eGrants/MyAmeriCorps Portal.

Some institutions will match the education award if it is redeemed at their school, but claiming the education award up front may also affect a member's eligibility for other financial assistance. Members should research the best option for their individual circumstances.

iv. Taxes

AmeriCorps Segal Education Award payments (interest and award disbursements) are taxable as federal income in the year they are redeemed. Members should anticipate this when choosing when and how much of their education award to redeem.

v. Transferability (42 U.S.C. 12601-12604, 12606 PART 2530 – Transfer of Education Awards)

Under certain limited circumstances, AmeriCorps State and National members who enrolled on or after October 1, 2009, may be able to transfer the education award they earn to another individual. A member may transfer an education award if the member was age 55 or older on the day he/she enrolled in the AmeriCorps State and National position; the award the individual is requesting to transfer has not expired; and the individual designated to receive the transferred award (a) is the transferring individual's child, grandchild, or foster child; (b) is a citizen, national, or lawful permanent resident alien of the United States; and (c) has not already utilized the equivalent value of two full-time education awards. The person considering the transfer to another party should verify any additional requirements or stipulations by contacting the National Service Trust prior to attempting to make a transfer.

A transferred education award may be used for the same purposes as an earned education award. Members can initiate a transfer request through the eGrants/MyAmeriCorps Portal. Individuals receiving a transferred award have 10 years from the receipt of award to redeem it.

5.8. Member Records (Terms and Conditions, 45 CFR 2522.820)

All Serve Wisconsin AmeriCorps programs will use the reporting systems or forms for member management and recordkeeping as instructed by Serve Wisconsin and/or CNCS. Programs must complete and submit member-related records to the Serve Wisconsin or CNCS in accordance with reporting instructions, grant agreement, and Terms and Conditions. Programs must retain copies of these records, forms and messages for review in case of audit or site visit.

Programs must be able to document that every member is eligible to enroll in AmeriCorps and to receive in-service and post-service benefits. Completion of all programmatic forms (including evaluations, timesheets, exit forms, etc.) is a requirement for successful completion of a term of service. Members who do not provide their forms in a timely manner may be denied a Segal Education Award. It is recommended that programs inform members of this at the beginning of their term as a way to encourage timely submission of forms from members. In addition, if required forms are not included in the member records, CNCS or Serve Wisconsin could recapture member costs from the program.

Serve Wisconsin and Serve Wisconsin AmeriCorps programs will use the following systems for various reporting/records requirements; more details follow the chart.

Form	**Format for Submission & Record Keeping**	**Date Due**
Member Application Form (electronic enrollment programs must have member complete the application on-line as first step)	My AmeriCorps Portal (if using online application) or hard copy retained in member file Note: a resume cannot be used in lieu of an application	Prior to enrollment
National Service Enrollment Form* Program must receive written permission to use the hard copy of the paper enrollment form. Otherwise this is completed in eGrants	Hardcopy in Member File; information entered electronically by PD in My AmeriCorps Portal	Signed on or before the date of member enrollment and entered by program director in Portal within 30 days of member enrollment date
Electronic National Service Enrollment Form – *preferred for members; required for programs*	Member completes electronically in My AmeriCorps Portal	Online enrollment and approved in Portal within 30 days of member enrollment date
Electronic National Service Exit Form and Verification of	Member completes electronically in My	Online exit and entered in Portal within 30 days of member exit date.

Member Hours – *preferred for members; required for programs*	AmeriCorps Portal	Approved hours verified in OnCorps; hours rounded down to whole number when entered into Portal.
Member Citizenship Documentation (if required)	Hard copy member eligibility confirmation form	Before member start date and enrollment.
Member Citizenship Verification Documentation (if required)	Manual verification submitted via fax or email to CNCS. Hard copy in member file	Within 30 days of request for verification from CNCS
Member Eligibility Confirmation Form (required in all member files)	Original hard copy in member file; copies sent to Serve WI.	Completed on or before the member's start date. Send copies of completed forms to your program officer for review.
National Service Exit Form* and Verification of Member Hours Program must receive written permission to use the hard copy of the paper enrollment form. Otherwise this is completed in eGrants	Hard copy in Member File; information entered electronically by PD in My AmeriCorps Portal	Signed on or before the date of member exit and entered by program director in Portal within 30 days of member exit date. Approved hours verified in OnCorps; hours rounded down to whole number when entered into Portal.
Checklist for Getting Program Started	For your use and reference	
Checklist for Getting Members Started	For your use and reference	
Checklist for Setting Up Admin & Financial Systems	For your use and reference	
Member Documentation Checklist	Electronically in OnCorps under Manage Records → Members → Members	Must be completed for each member
Member Change of Status/Term	Changes approved by Serve Wisconsin and made in My AmeriCorps Portal and OnCorps	In Portal and OnCorps within 30 days of the member change of status
Member Service Locations	MyAmeriCorps Portal	Member service locations must be entered in the Portal within 30 days of the member's selection
Member Timesheets	Electronically in OnCorps	Member timesheet submitted by the individual who supervises AC members. Due date established by the program in OnCorps.

Member Contract	Fully authorized original hard copy in member file, copy to member	Signed by member and supervisor on or before the date the member begins their term of service
Member Position Description	Hard copy (incorporated in Member Contract) in member file	To be provided to Serve Wisconsin upon request and included in the Member Contract
Health Care Waiver (for FT members waiving health care benefits)	Approval of the member to waive this benefit	Within 30 days of member enrollment or change of status resulting in changes to benefits availability
Health Care, Child Care Enrollment	If applicable, copy of member's enrollment form	Within 30 days of member enrollment or change in status resulting in changes to benefits availability
Member Criminal History Check(s)	Hard copy of results and review in separate & secure location (include notation that findings were considered prior to enrollment)	Initiated/Completed on or before the member start date. See Section 6.2, 5.2. National Service Criminal History Checks (Regulations 45 CFR 2510, 2522, 2540, 2551 and 2552; Regulations published on October 5, 2012) for additional information
Member Suspension	Supporting documentation in member file and change in status in Portal	In Portal within 30 days of change of member status
Member Early Exit – Compelling Personal Circumstances (not employment)	Approval from Serve WI prior to exit; supporting documentation in member file	Online exit and entered in Portal within 30 days of member exit date. Approved hours verified in OnCorps; hours rounded down to whole number when entered into Portal.
Member Early Exit – Compelling Personal Circumstances (employment)	Approval from Serve WI prior to exit; supporting docs, including info. about employment, in member file	Serve WI approval prior to exit. Online exit within 30 days of member exit date. Approved hours verified in OnCorps; hours rounded down to whole number when entered into Portal.
Member Early Exit – Cause	Supporting documentation in member file	Online exit and entered in Portal within 30 days of member exit date. Approved hours verified in OnCorps; hours rounded down to whole number when entered into Portal.
Member Mid-Term Evaluation (required for FT and HT members)	Hard copy in member file	Within 30 days of the halfway point of service for HT and FT members. Include hours served to date.

Member End-Term Evaluation	Hardcopy in member file	Within 30 days of the end of service for all members.
Member Serious Injury or Death Report	Notify your program officer	Within 48 hours of injury during service or death.

A. Confidential Member Information (Terms and Conditions - Specific IX.C)

The program must maintain the confidentiality of information regarding individual members. The program must obtain the prior written consent of all members before using their names, photographs, and other identifying information for publicity, promotional or other purposes. Parental or legal guardian consent must be obtained for members under 18 years of age. Programs should include the consent form as part of the member contract. Programs may release aggregate and other non-identifying information, and are required to release member information to Serve Wisconsin and the Corporation and its designated contractors. The program must permit a member who submits a written request for access to review records which pertain to the member and were created pursuant to the grant.

B. Member Eligibility Documentation (Terms and Conditions - Specific IX.B and Regulations 45 CFR 2522.200)

SSN & Citizenship

Program directors should pay special attention to the requirement that members are citizens, nationals or lawful permanent resident aliens of the United States. This is verified by reviewing one of the original certified documents listed on the *Wisconsin National and Community Service Board AmeriCorps Member Eligibility Confirmation* form. Note that it is against Wisconsin State Law to make photocopies of vital records, such as birth and death certificates. This form must be signed by both the member and AmeriCorps program staff on or before the member's enrollment date.

In addition to the program's documentation of citizenship, the Corporation utilizes an automatic, electronic verification process to satisfy this requirement. The process has two different trigger points:

- At the time of acceptance of an AmeriCorps position in the Portal (for members who enrolled electronically) OR
- At the time of enrollment in the Portal (for members whose enrollment information is entered by program staff).

When either of the situations above occurs, the prospective member's citizenship information and Social Security Number (SSN) will be sent electronically to the Social Security Administration and the Department of Homeland Security for verification; this process may take multiple weeks to finish, so ensure that you have proper eligibility documentation prior to enrolling the member. The SSN verification is a two-step process. The first part includes the validation of the SSN, and that the SSN is consistent with a person of the given name, gender and date of birth (DOB). The second part is a validation of citizenship eligibility. If the first part of the validation fails, the second part is not initiated.

If both parts return a successful validation, the member's record in the portal will indicate "verified" in the Portal and will be visible to both the member and the program staff. Members who have served previous terms, prior to the enactment of the automatic verification, will appear as "previously served." No further action is required by the program if the member's citizenship status is listed as verified or previously served (unless requested by CNCS).

i. Procedures for manually verifying citizenship status and SSN for National Service Trust

If the individual's information cannot be automatically verified, the program will be contacted by email to request that additional documentation to support the member's citizenship status be submitted. The email may be misleading in what it is asking for, and it should, but may not, contain information about the additional documentation that is needed and how to provide it. If the email does not provide instructions on how to complete the verification process, contact the eGrants Helpdesk and be persistent. It is important that the program stay persistent on this issue, as a member who has not had their information verified will not be able to access her/his education award following successful completion.

On August 27th, 2015 Serve Wisconsin received guidance from the National Service Trust that the Office of General Counsel approved the *Wisconsin National and Community Service Board AmeriCorps Member Eligibility Confirmation* form as sufficient documentation for the National Service Trust to verify Wisconsin members' citizenship and Social Security Number status. It may take multiple emails and faxes to complete this process. If the requested documents verify the individual's eligibility, the person's citizenship status will appear as "manually verified" in the Portal. It is the programs responsibility to ensure that the person's status changes to "manually verified," and the program should be persistent until the change occurs.

Until the "manually verified" status appears in the Portal the system may not allow the member to be enrolled. If the Portal does allow the member enrollment process to begin, you should ensure that the *Wisconsin National and Community Service Board AmeriCorps Member Eligibility Confirmation* form is completed in its entirety before enrolling the member. **The program must maintain copies, in the member's file, of any citizenship verification documentation that was obtained and submitted.** If the issue persists, you may also get in touch with Patrick O'Brien, Trust Officer with the National Service Trust, at pobrien@cns.gov or 202–606–6662 to manually verify a member's status.

ii. SSN and Citizenship Status Report

It may be difficult for a program to know when a Citizenship status and/or SSN have been returned because an email may be sent to just the member, or an email may not be received all. Even after a program is aware of the situation and has taken steps with the Trust to resolve it, there may be no confirmation that it has been resolved. Therefore, it is in the program's best interest to run a SSN and Citizenship Status Report to verify which members of a given program year have an acceptable SSN and Citizenship Status. To do so the program must first contact eGrants Helpdesk to request permission to run the report. Please use your program code and specifically mention the program years you are requesting access to and the other program

codes that correspond to those years (the codes can always be found on the facesheet of your eGrants printout application). If you do not have access, you will receive an error message like the one shown below.

As mentioned above, the automatic process will verify that the member's DOB matches what the Social Security Administration has in their records for this individual. So if the social security number is verified, the DOB is considered valid, but the system will not automatically verify that the member meets the age requirements; thus, the subgrantee can look in the system and see if the DOB meets the minimum age requirement once the social security number is verified.

iii. Eligibility Confirmation Form

The *Wisconsin National and Community Service Board AmeriCorps Member Eligibility Confirmation* form exists to ensure that programs have verified that participants meet all eligibility requirements including the age and education requirements set forth in 45 CFR 2522.200, which are not automatically verified. It is a required that this form be completed, signed and dated by the member and program staff prior to the member serving any hours, or the member is not eligible to serve. Serve Wisconsin Program Officers review 100% of these forms each year. For members who are returning for another term of service, the program does not have to complete another form if one still remains on file.

If it is discovered that the individual is not eligible to serve, your organization may be responsible for any grant costs associated with the individual. Because of this, Serve Wisconsin highly recommends that programs' members utilize the electronic enrollment process because it will give additional time to collect documentation, if needed.

iv. Photo Identification & Member Age Eligibility Documentation

The identification of the member must be verified by the program at the time of member enrollment using a government-issued form of photo identification, such as a driver's license or passport. Checking the individual's photo identification helps you to ensure that the individual is

who she/he claims to be and that you run the required criminal history checks using the correct name, date of birth, etc. Government-issued forms of photo identification, in addition to government-issued birth certificates, may be used when filling out the *Wisconsin National and Community Service Board AmeriCorps Member Eligibility Confirmation* form, which can be found on Basecamp in the Program Resources Folder—Enrollment & Eligibility.

v. National Service Criminal History Check Documentation

Please refer to section I. National Service Criminal History Check Documentation for this information.

C. Member Enrollments – Paper Forms and My AmeriCorps Portal/eGrants

Member enrollment data must be entered into the My AmeriCorps Portal within 30 days of the member's service start date. If a member is enrolled or exited past 30 days of that event for reasons entirely beyond the program's control please provide your assigned program officer an explanation and documentation.

eGrants is the access point to the Portal for program directors and this is the official system of record for the Corporation. Programs may have their members complete the enrollment and exit forms either electronically through the Portal or via paper forms.

To use paper forms, however, the program will have to have approval to continue to routinely have their members complete paper enrollment and exit forms, with program staff completing the member information in eGrants AmeriCorps Portal enrollment and exit forms. Programs do not have to request permission to continue using paper forms if their members complete their own enrollment and exit information in the Portal. To request permission to routinely complete paper member enrollment and exit forms and allow program staff to enter member enrollment and exit information in the Portal, you must submit a request – including information demonstrating that technological limitations make it impossible or extremely burdensome for members to complete their own enrollment and exit forms in the Portal – to your currently assigned Serve Wisconsin Program Officer.

Requests will be approved in cases where the grantee or subgrantee is able to demonstrate that technological limitations make it impossible or extremely burdensome for members to complete their own enrollment and exit forms in the Portal. Technological limitations would include lack of internet access or a member population with low computer literacy skills that cannot be addressed through training or technical assistance.

See Section 5.1. Eligibility, Selection, and Enrollment of Members (45 CFR 2522.200- 45 CFR 2522.210) and Section 5.4. Exiting Members and Refilling Positions (Terms and Conditions and 45 CFR 2522.230) for more information. In addition, as stipulated in Agreement Addendum #1, programs are required to fill out the Member Documentation Checklist in OnCorps. See Section 5.1.E, Process to Enroll Members, for more information.

D. Member Contracts & Position Descriptions (Terms and Conditions – Specific V.B)

All members must be covered by a member contract that is fully-executed and in effect during their entire term of service. This means that the agreement must be signed and dated by both the member

(and a parent/guardian for those under 18) and program representative on or before the member's first day of service. Serve Wisconsin recommends that both the program director and the site supervisor are included as program representatives on the contract.

Any amendments to the member contract must be conveyed in writing; signed and dated by the member, by the parent/guardian for members under age 18, and program representative; and attached to the original member contract. The member must also be given a copy of the amendment for their files.

For information on how to extend a member's contract past the grant contract end date, see section 5.3.F. No-Cost Extensions (Grant Contract Article 5, Agreement Addendum #1, clause 14)

All member contracts should include the items listed in the *Serve Wisconsin Getting Members Started Checklist*. For example, the member contract must state the start and end dates of service and the minimum number of hours the member must serve. To receive the full living allowance and Segal Education Award, the member must satisfy the minimum number of hours to be served and must have performed satisfactorily.

i. Components of Member Contracts:

a. Member Position Description: Verified to include no prohibited activities & indicating if member has recurring access to vulnerable populations
b. The minimum number of service hours (as required by statute) and other requirements (as developed by the grantee) necessary to successfully complete the term of service
c. Time frame members have to complete the required service hours
d. The amount of the education award being offered for successful completion of the term of service in which the individual is enrolling
e. Standards of conduct, with consequences, as developed by the program
f. Prohibited Activities, including those specified in the regulations at 45 CFR 2520.65 (see section D. Prohibited Activities (Terms and Conditions - Specific V.C and 45 CFR 2520.65))
g. The text of 45 CFR 2540.100(e)-(f), which relates to Non-duplication and Nondisplacement
h. The text of 45 CFR 2520.40-.45, which relates to fundraising by members;
i. Requirements under the Drug-Free Workplace Act (41 U.S.C. § 701 *et seq*. & 2 CFR 182)
j. Civil rights non-discrimination requirements, complaint procedures, & rights of beneficiaries
k. Suspension and termination rules
l. The specific terms under which a member may be released for cause
m. Grievance Procedures (see section F. Grievance Policy (45 CFR 2540.230))
n. If applicable, participation in GED/HSED preparation while in the program and requirement to obtain GED/HSED prior to using the education award
o. Member signature along with date of signature (signed prior to commencement of service). Please note, if the member is under 18 years of age, the agreement must be

signed and dated by the member's parent or legal guardian.

p. Program representative(s) signature along with date(s) of signature

E. Member Position Descriptions (Terms and Conditions – Specific V.A, B)

Every member contract must incorporate a member position description (by reference or within the body of the member contract), specific to the member. Position descriptions must fully describe the duties assigned to the member and should indicate whether or not the member will have recurring access to vulnerable populations. See Section B. Member Service Projects and Policies for more guidance on allowable member activities and creating compliant member position descriptions.

F. Grievance Policy (45 CFR 2540.230)

The member contract must contain the grievance policy to be used by individuals who wish to challenge the decisions of an organization. The grievance policy must specify that in cases where the grievance is filed by an individual applicant or participant, that remedies include the applicant's selection or reinstatement, as the case may be and other changes in terms and conditions of service applicable to the individual. Programs must maintain documentation of grievances filed and the program's response.

The grievance procedure must include opportunity for:

i. Alternative Dispute Resolution (ADR)

a. ADR proceedings must be initiated within 45 calendar days
b. The aggrieved party must be advised in writing of his or her right to file a grievance and right to arbitration; if the matter is resolved, and a written agreement is reached, the party will agree to forego filing a grievance in the matter under consideration
c. ADR process must be aided by a neutral party

ii. Grievance Hearing

a. Except for a grievance that alleges fraud or criminal activity, request must be made within one year after date of alleged occurrence
b. Must be held no later than 30 calendar days after the grievance is filed
c. A decisions must be made no later than 60 days after the grievance is filed
d. The neutral party involved in the ADR may not participate in the grievance procedure, and no proceeding of the ADR may be referred to or introduced into evidence during any grievance and arbitration hearings

iii. Binding Arbitration

a. An option if the hearing is adverse to the aggrieved party or if a decisions is not made within 60 days of the filing of the grievance
b. Arbitrator must be independent and selected by agreement of the parties
c. If the parties cannot agree on an arbitrator within 15 calendar days after receiving a request from one of the grievance parties, the Corporation's Chief Executive Officer will appoint an arbitrator from a list of qualified arbitrators
d. Must be held no later than 45 calendar days after the request for arbitration, or, if the arbitrator is appointed by the Corporation's Chief Executive Officer, the proceeding must

occur no later than 30 calendar days after the arbitrator's appointment

e. A decision must be made no later than 30 days after the commencement of the proceeding
f. Cost of arbitration must be divided evenly between the two parties, unless the aggrieved party prevails, in which case the program must pay the total cost of the proceedings plus the prevailing party's attorney's fees
g. If a grievance is filed regarding a proposed placement of a participant, such placement must not be made unless the placement is consistent with the resolution of the grievance

G. Member Benefits

For eligible members, the member file must include enrollment and/or waiver information for health care and child care. All members should be informed of their eligibility for AmeriCorps benefits such as the living allowance, health care, student loan forbearance, and childcare; this should be documented.

If members serving the same terms of service receive varying living allowance amounts, the program must document the rationale behind this variance and this documentation should be retained in the member file. This must be based on allowable factors, such as members serving in areas with higher/lower costs of living. See Section Payment Amounts.

H. Member and Staff Timekeeping (Terms and Conditions – Specific V.F, 2 CFR, & Office of Management and Budget Guidance)

Serve Wisconsin requires that all programs use OnCorps as the official timekeeping system for members. Programs are required to ensure that time and attendance recordkeeping is conducted by AmeriCorps members. Time logs must be entered into and approved in the OnCorps online timekeeping system on a regular basis. Members should always be describing their service in OnCorps on their timesheets, but they should use extra detail whenever serving longer than eight hours on any given day.

Program directors must set up the OnCorps time tracking system and instruct members so that they separately record time spent on service, fundraising, and training correctly. OnCorps regularly offers training webinars and tutorials can be found on their website under the *Help* menu tab. Members must maintain their own timekeeping account and password and enter their hours directly. Site supervisors must also have an OnCorps account so that the individual directly overseeing the member's service is the one to approve the timesheets in OnCorps.

Staff timesheets are required for individuals whose salary is paid in full or in part by grant funds or grantee match funds (cash or in-kind). OnCorps includes site supervisor in-kind hours reporting as a service to programs to facilitate calculations of site supervisor match; however, the OnCorps system for site supervisors does NOT meet CNCS requirements regarding timesheets for personnel listed on the AmeriCorps grant so programs must ensure that site supervisors keep another time record that does meet these requirements.

Timekeeping requirements differ for Professional Corps programs which have received written Corporation approval to use the timekeeping practices of their profession. Approved staff timesheets

must accurately divide time between AmeriCorps grants and other responsibilities, signed by the staff person and a supervisor, and must track actual time, not percentages. Reports reflecting the distribution of activity of each employee must be maintained for all staff members (professionals and nonprofessionals) whose compensation is charged, in whole or in part, directly to awards. For more information see below and the applicable 2 CFR Appendixes.

i. Staff Timekeeping Requirements for Non-profit Organizations

(2 CFR Appendix B to Part 230, Section 8, Compensation for Personal Services) Reports maintained by non-profit organizations to satisfy these requirements must meet the following standards:

a. The reports must reflect an after-the-fact determination of the actual activity of each employee. Budget estimates (i.e., estimates determined before the services are performed) do not qualify as support for charges to awards.
b. Each report must account for the total activity for which employees are compensated and which is required in fulfillment of their obligations to the organization.
c. The reports must be signed by the individual employee, or by a responsible supervisory official having first-hand knowledge of the activities performed by the employee, that the distribution of activity represents a reasonable estimate of the actual work performed by the employee during the periods covered by the reports.
d. Reports must be prepared at least monthly and coincide with one or more pay periods.

ii. Staff Timekeeping Requirements for Educational Institutions

(2 CFR Appendix A to Part 200, Section J.10. Compensation for personal services) Compensation for personal services covers all amounts paid currently or accrued by the institution for services of employees rendered during the period of performance under sponsored agreements. Such amounts include salaries, wages, and fringe benefits (see subsection J.10.f of this Appendix). These costs are allowable to the extent that the total compensation to individual employees conforms to the established policies of the institution, consistently applied, and provided that the charges for work performed directly on sponsored agreements and for other work allocable as F&A costs are determined and supported.

a. Plan-Confirmation: Under this method, the distribution of salaries and wages of professorial and professional staff applicable to sponsored agreements is based on budgeted, planned, or assigned work activity, updated to reflect any significant changes in work distribution.
b. After-the-fact Activity Records: Under this system, the distribution of salaries and wages by the institution will be supported by activity reports.
c. Multiple Confirmation Records: Under this system, the distribution of salaries and wages of professorial and professional staff will be supported by records which certify separately for direct and F&A cost activities.

iii. **Staff Timekeeping Requirements for State, Local, and Tribal Governments** – See **2 CFR 225 Appendix B**

iv. **Members Submitting Service Prior to the Date it Occurs**

A member should never submit hours for future days, and a supervisor should never approve a timesheet that was submitted prior to the end of the days served. If this happens, the program staff must return the timesheet to the member and have them resubmit after the hours were actually served.

OnCorps has a few features that help spot this error but will not prevent it entirely. In the screenshot below we see that this member submitted her/his timesheet on February 16, while the timesheet period is for February 16 to February 28. OnCorps automatically highlights, in a light yellow, any days in a timesheet that are after the date of submission. Any hours that are submitted on days that are highlighted yellow will be questioned and should be returned to the member to have the timesheet verified and be resubmitted. In the example picture below, the timesheet must be returned to the member to be changed for the hours entered on February 17, 19, and 23.

OnCorps also enters a statement in red where the site supervisor would make his/her approval that states, “Time entered after today’s date, this timesheet cannot be approved until after the date of the last time entered."

You are approving time entered for period: 02/16/2017 - 02/28/2017

This time sheet is DUE: 03/05/2017
This time sheet was submitted for approval on 02/16/2017 at 5:02 PM

		Training	Service		
Day	Fund raising	Training	Direct Service	Funraising	Total Hours
Thu Feb 16	0	0	8	0	8
Description:	test service				
Fri Feb 17	0	1	5	0	6
Description:	does this show up yellow				
Sat Feb 18	0	0	0	0	0
Description:					
Sun Feb 19	0	0	8	0	8
Description:	I know for sure I am gonna serve these hours				
Mon Feb 20	0	0	0	0	0
Description:					
Tue Feb 21	0	0	0	0	0
Description:					
Wed Feb 22	0	0	0	0	0
Description:					
Thu Feb 23	0	0	8	0	8
Description:	some more for sure service				
Fri Feb 24	0	0	0	0	0
Description:					
Sat Feb 25	0	0	0	0	0
Description:					
Sun Feb 26	0	0	0	0	0
Description:					
Mon Feb 27	0	0	0	0	0
Description:					
Tue Feb 28	0	0	0	0	0
Description:					
Totals:	0	1	29		30

Comments/Description:

Approve/Reject Time sheet(s) (select one)

I have reviewed and **approve** this Time sheet(s).

Time entered after today's date, this timesheet cannot be approved until after the date of the last time entered

I have reviewed and **DO NOT approve** this Time sheet(s). (AmeriCorps Member will be notified to correct and re-submit this time sheet)

Comments:

I. Member Performance Evaluations (Terms and Conditions - Specific V.E, 45 CFR 2522.220[c], 45 CFR 2526.15)

All full-time and all half-time members must have a mid-term and end-of-term written evaluation. Mid-term evaluations are not required for members who exit before the mid-point of their terms, or for members serving less than half-time. All members, regardless of term of service or successful completion, must have a written end-of-term evaluation. Member evaluations should contain both the member's and supervisor's signatures and be dated by both parties.

i. Minimum Requirements

The end-of-term evaluation should address at a minimum:

1. whether the member has completed the required number of hours (must state the

number of hours completed to date and how many hours the member has left to serve)
2. whether the member has satisfactorily completed assignments, and
3. whether the member has met other performance criteria that were clearly communicated at the beginning of the term of service.

ii. Evaluations for Members Who Exit Early

All members who exit early must have a member end-of-term evaluation completed at the time of their exit and the evaluation must be maintained in the member file. They are not required to have a mid-term evaluation if exited before the mid-point of their service. Completing the exit form in the eGrants/My AmeriCorps Portal is not sufficient to meet the evaluation requirement. If a member is unavailable to sign the end of term evaluation, program directors should make a note of attempts to contact the member, sign, and date the document (see section Members that Leave without Completing Exit Process)

J. Member Training

Programs should use sign-in sheets, webinar attendance logs, or other methods to document member attendance at and completion of program-provided member trainings. If a member attends an outside training to fulfill specific AmeriCorps program requirements, he/she should turn in to the program director an agenda or confirmation notice signed and dated by the training facilitator for retention in the member file. In instances of virtual trainings, a member should print a screenshot to sign and date for documentation, or print/sign/date the post-training follow-up notice and materials.

See Section B. Required and Suggested Member Training.

K. Member Exits – Paper Forms and My AmeriCorps Portal/eGrants

All members must be exited in the Portal as this is the official system of record for the Corporation. Programs may elect to exit members with a completely electronic process by having the member complete the exit form in the Portal, or programs may have the member complete and sign the paper exit form. See C. Member Enrollments – Paper Forms and My AmeriCorps Portal/eGrants for more about the approval process to be routinely using paper forms. The program director would enter the information from the paper form for the member and retain the form in the member's file. As the program is managing the member exit process, they should be mindful of the Corporation's 30-day exit requirement between the member's exit date and the completion of the eGrants exit process and allow adequate time to collect information and record it in the Portal (as needed).

Prior to exiting a member, the program must verify the number of approved hours served by the member in OnCorps. The program will enter this number of approved hours in eGrants, rounded down to the next whole number. It is also highly recommended that the program director ensure that all required documents are included in the member's file. That will enable the program director to attempt to obtain any missing documents prior to exiting the member.

i. Failure to Complete – Repercussions on Program

The program should be aware that failure to include a fully completed member exit form may result the questioning and recapturing of the education award from the program during audit. Therefore, the program director should make every effort to have a signed member exit form (electronically approved in eGrants is acceptable) for all members, regardless of the type of exit.

ii. Failure to Complete – Repercussions on Member

All members must complete the program's exit process. A member who does not fully complete the exit process will be deemed not to have met program requirements and therefore will be ineligible for an education award (even if they complete all other aspects of the program successfully).

iii. Members that Leave without Completing Exit Process

If a member leaves their term of service without completing the appropriate (electronic or paper) exit forms, the program should make several attempts to contact the member to complete the forms and retain documentation of these attempts. Programs should be mindful of the CNCS 30-day requirement for exits as they determine the policies for these situations. Timelines and contacts made with members should allow adequate time to make several contacts and exit the member within the 30-day timeframe.

In cases where it is impossible for the member to complete the exit process resulting from the death of the member or otherwise, the program should exit the member within 30 days of the last day of service. The program should navigate to the exit form in the MyAmeriCorps Portal via the pending exits tab of the workbasket if required exit date is within the next month. If the exit needs to be *unlocked* because the expected date is far in the future, the program should pull up the member by searching by name or NSPID under *Manage Members*. The unlock icon is available under member home page.

My AmeriCorps includes an option for the program to bypass the member-certified exit. This is needed because the member is not available to certify their own exit on paper or via My AmeriCorps. The member exit certification bypass option is found on the member part of the exit form. Scroll to the bottom of the member portion of the exit to find it. To proceed with this option, the program must document in the member file the reason(s) the member could not complete their portion of the exit form. The burden of proof is on the program. For a member who has died, CNCS does not specify that a death certificate or other evidence is required.

Next, the program will complete the program part of the exit process. For a member who has died, the member would be exited by the program for compelling personal circumstances. If the member is younger than 55 and/or started service prior to 10/1/09, the member could also be exited for cause since no award could be accessed by a designated transferee. The same documentation would be used to support the compelling personal circumstances exit as would be used to support the member exit certification bypass.

The program should complete the end of term evaluation even though no subsequent service will be completed by the member. The program should explain in the file why other elements of the program's exit process (such as member survey, if applicable) are not able to be followed.

iv. Program Requirements to Attempt to Obtain Exit Paperwork

The communication to the member should provide instructions on completing the exit and provide a specific timeline in which the member should complete the exit. Multiple attempts using multiple methods of contacting a member should be used. All of these attempts should be documented in the member file – for example, copies of email messages, copies of letters/memos, copies of certified mail return receipts, and written notes documenting phone or text messages are examples of appropriate documentation for this purpose. If, despite these attempts, the program is unable to obtain the completed exit form, they should manually complete a paper exit form for the member and exit them in the Portal. They should attach documentation of their contact attempts to the paper exit and make a written notation on the exit form itself saying, "The program was unable to obtain a completed exit from the member." This message should be signed and dated by the program director and all of these documents should be maintained in the member's file.

L. Disciplinary Actions

Programs should have a disciplinary policy that outlines steps that may be taken when members fail to comply with expectations. Programs should document in the member file whenever disciplinary problems arise and the corresponding action (verbal warning, written warning, etc.) that is implemented.

M. Suspensions or Early Exits/Terminations

If the program suspends or exits a member early, whether for cause or for compelling personal circumstances, the reason for the suspension or exit must be documented in the member file. Regardless of the sensitivity of the issue, programs are required to maintain acceptable supporting documentation of this information in the member files (which should be secured and confidential).

5.9. Member Activities

A. Creating Compliant Position Descriptions (Terms and Conditions - Specific V.A)

Programs should use the following guidelines to ensure that member position descriptions accurately and adequately describe the allowable duties assigned to the member.

1. Indicate any minimum qualifications for the position.
2. Are specific to each member (unless members are performing the exact same activities).
3. Do not contain the phrase, "other duties as assigned" or other vague statements about member responsibilities.
4. Describe all member activities explicitly to ensure that prohibited activities are not included.
5. Do not use "employment" terms like: "work/job," "job description," "hired," "employee," etc. Instead, use the appropriate national service terminology such as "serve/service," "position description," "enrolled," and "member/service participant."
6. Avoid abbreviations or acronyms – if used, spell out the term at the first usage and then use the acronym/abbreviation later in the document.
7. If a member position description includes member participation in volunteer recruitment, management, or similar activities, a brief description of the potential volunteer activities for which the member will be recruiting must be added within the position description itself. For example, "Recruit and manage volunteers to support the afterschool program."

See Section E. Member Position Descriptions for more information regarding member position descriptions.

B. Member Service Projects and Policies

While it is allowable for members to have participation/leadership in service projects (outside of the day-to-day service activities) as part of the member position description or service activities, the program must ensure that the activities completed by the member are in alignment with the program's identified community needs and member activities as outlined in the approved grant application. In addition, the program must have a way to verify the types of projects in which the members are involved and how the program ensures that they do not include prohibited and/or unallowable activities. Generally this will require a program policy that includes review/approval of member service project plans and review of member service project reports.

Please see Section F. No Hours Served in a Pay Period for more information on incidental service.

C. Fundraising & Training

i. Member Fundraising (45 CFR 2520.40-.45)

AmeriCorps members may raise resources directly in support of a program's service activities; however, they are excluded from raising funds for their living allowance, for an organization's operating expenses or endowment, and writing grant applications for CNCS grants including

AmeriCorps grants, or any other federal grants. All programs are required to ensure that individual members limit their time spent fundraising as defined in 45 CFR 2520.40 to not more than 10 percent of their term. Further, programs are required to identify fundraising, training and service hours separately on the member time records. Members who do not engage in fundraising activities should indicate zero hours on their time records in the *Fundraising* area.

iii. Member Training (45 CFR 2520.50-55)

Members are required to receive certain trainings (see the 5.10. Member Training (Terms and Conditions, 45 CFR 2520.50, and 2522.100)). Since all members are required to receive training, members with zero training hours listed will raise concerns in member monitoring. No more than 20 percent of the aggregate of all AmeriCorps member service hours in your program, as reflected in the member enrollments in the National Service Trust, may be spent in education and training activities. Capacity-building activities and direct service activities do not count towards the 20 percent cap on education and training activities.

D. Prohibited Activities (Terms and Conditions - Specific V.C and 45 CFR 2520.65)

The Corporation has placed a strong emphasis on monitoring for prohibited activities. All programs should make note of the prohibited activities and ensure that members, site supervisors, and other staff are well-versed in the prohibited activities. It is required that prohibited activities are covered in the Member and Site Supervisor Orientation, as well as specifically detailed in the member contract. These prohibited activities include:

i. Attempting to influence legislation;
ii. Organizing or engaging in protests, petitions, boycotts, or strikes;
iii. Assisting, promoting, or deterring union organizing;
iv. Impairing existing contracts for services or collective bargaining agreements;
v. Engaging in partisan political activities, or other activities designed to influence the outcome of an election to any public office;
vi. Participating in, or endorsing, events or activities that are likely to include advocacy for or against political parties, political platforms, political candidates, proposed legislation, or elected officials;
vii. Engaging in religious instruction, conducting worship services, providing instruction as part of a program that includes mandatory religious instruction or worship, constructing or operating facilities devoted to religious instruction or worship, maintaining facilities primarily or inherently devoted to religious instruction or worship, or engaging in any form of religious proselytization;
viii. Providing a direct benefit to –
    a) a business organized for profit;
    b) a labor union;
    c) a partisan political organization;
    d) a nonprofit organization that fails to comply with the restrictions contained in section 501(c)(3) of the Internal Revenue Code of 1986 except that nothing in this

section shall be construed to prevent participants from engaging in advocacy activities undertaken at their own initiative; and

e) an organization engaged in the religious activities described in paragraph vii of this section, unless Corporation assistance is not used to support those religious activities;

ix. Conducting a voter registration drive or using Corporation funds to conduct a voter registration drive;

x. Providing abortion services or referrals for receipt of such services; and

xi. Such other activities as the Corporation may prohibit (see Additional Prohibited Activities)

E. Additional Prohibited Activities (45 CFR 2520.40)

Other prohibited activities include:

i. Members raising funds for their living allowance

ii. Raising funds for program operating expenses or endowment

iii. Writing grant applications for CNCS grants, including AmeriCorps

iv. Writing grant applications for funding provided by other federal agencies

v. Recruiting volunteers to perform prohibited activities or distributing materials related to prohibited activities (i.e. activities in support of the Prohibited Activities are not allowed. For example, it is not allowable for an AmeriCorps member to recruit community volunteers to perform a prohibited activity, such as voter registration drives, nor is it allowable for an AmeriCorps member to distribute materials related to a prohibited activity, such as registration information for religious instruction.)

F. Teleservice (2017.01 ASN Interim Guidance - Teleservice)

The interim guidance provided by CNCS should not be taken as a change in AmeriCorps State and National's position that members should generally be providing service directly to the people and in the communities where they serve rather than performing service remotely. Therefore, teleservice should be rare, if ever, and involve appropriate documentation, supervision and oversight.

The following guidance is provided for those unique situations in which a program determines that teleservice is appropriate or when a small number of a member's service hours can properly be accrued through teleservice. Teleservice is appropriate only when the activity can be meaningfully supervised and the hours verified independently. If a grantee or subgrantee determines that its AmeriCorps members will be allowed to teleserve, the grantee must establish a policy that addresses the following:

- Written authorization of teleservice in advance
- Expectations of the communication requirements between supervisors and teleserving members
- Mitigation of the increased risk of time and attendance abuse
- Appropriate supervision including validation of the activities to be performed, and
- Verification of hours claimed.

Further, the grantee should consider updating its insurance coverage to address legal liability attribution (for the program or teleserving member) for incidents that occur during teleservice.

Programs should be aware that their staff may be subject to legal sanctions for erroneously certifying that AmeriCorps members have sufficient valid service hours to complete their terms of service. In addition there are legal penalties for knowingly submitting false claims to the government.

5.10. Member Training (Terms and Conditions, 45 CFR 2520.50, and 2522.100)

The program must provide members with adequate supervision by qualified supervisors consistent with the approved grant application. Any questions or requests for clarification regarding the information below and ongoing programmatic training and technical assistance may be directed to the assigned program officer.

A. Member Orientation [45 CFR 2522.100 (g)(2), and National Policy FAQs]

Programs must conduct a member orientation designed to enhance member sensitivity to the community and comply with any pre-service orientation or training required by the Corporation. At a minimum, these items should be covered during orientation and explicitly listed on the member orientation agenda:

i. Member rights and responsibilities, including the Program's code of conduct,
ii. Prohibited activities (including those specified in the regulations)
iii. Requirements under the Drug-Free Workplace Act (41 U.S.C. 701 *et seq.*) & 2 CFR 182,
iv. Suspension and termination from service,
v. Member contracts
vi. Grievance procedures,
vii. Sexual harassment, other non-discrimination issues, and other topics as necessary,
viii. National Service, CNCS, Serve Wisconsin, AmeriCorps in Wisconsin
ix. Host site/service partners if applicable
x. Communities where the members will serve

B. Required and Suggested Member Training

Required training topics and suggested training ideas are covered below. Training should also include structured opportunities for members to reflect on and learn from their service. The training requirements vary and are indicated below for each topic/idea.

Required for all Serve Wisconsin Programs:

Citizenship
Citizenship training is required for all programs and may include a session facilitated by a college/university office of civic engagement, relevant government or nonprofit agency, resource from https://www.nationalservice.gov/resources, etc. This training should be reported in your Citizenship Training performance measure.

All programs must use service experiences to help participants achieve the skills and education needed for productive, active citizenship, including opportunities for participants to reflect on their service experiences. In addition, all programs should encourage every participant who is eligible to vote to register to vote.

Required for Youth Corps Programs

CPR/First Aid
Required for Youth Corps programs regardless of position type except Education Award Programs; recommended for multi-site placement programs. As mentioned in section J. Member Training, programs that are required to provide CPR/First Aid training to members must keep copies of certification or the completed Serve Wisconsin form in member files for documenting member participation in the training.

Required For All Programs Except Education Award Programs:

Conflict Resolution

Conflict Resolution Training is required for all programs except Education Award Programs, per your AmeriCorps Grant Agreement Addendum #1.Tutoring Training Required For Programs Engaged In Literacy Tutoring Programs: Tutor training is required for those programs engaged in literacy tutoring activities in schools and after-school programs. See 45 CFR 2522.900 - 2522.950 for tutoring program guidelines.

Suggested Trainings:

Volunteer Management
Volunteer management training is not required but can be provided to members. This type of training is most often accessed through your local United Way, Volunteer Center or Community College. Volunteer Generation Fund grantees may also be available to provide this training.

Life after AmeriCorps
Life after AmeriCorps training is not required but may be accessed through any of these means: AmeriCorps Alums, National Service Resources, a college/university career center, etc. Thinking about how to engage your alumni is an important piece of program management, as it will pay returns in member recruitment, volunteer recruitment and more.

Disaster Response
Disaster response training is encouraged but not required. Examples of disaster preparedness training could include CPR/AED/First Aid training, Volunteer Reception Center/Emergency Volunteer Center training, etc.

Online courses are also offered by the Corporation that may be used as training resources.

C. Site Specific Training

Members should be provided the benefit of additional training and education opportunities relevant to their service and personal development, at the discretion of the program and approval by program director; however, programs should ensure that members do not spend more than 20 percent of the aggregate of all AmeriCorps member service hours in your program, as reflected in the member

enrollments in the National Service Trust, in education and training activities. As with fundraising, programs are required to identify training hours separately on the member time records. For more guidance on member time requirements around training and fundraising see Section C. Fundraising & Training.

D. Training Collaboration and Providers

When planning for trainings, one option for programs is to reach out to local organizations and qualified individuals to conduct some of the required training topics in order to foster community awareness and partnerships. Programs are encouraged to open required trainings, service projects, and other general formal or informal gatherings of your members to members from other programs in the area in order to facilitate a local network of service and support.

Chapter 6 – Financial and Grants Management

Contents

6.1. Grant & Financial Management Overview 128

6.2. Regulations & Requirements 129

A. Code of Federal Regulations 129

B. State and Local Regulations 131

C. Grant Terms and Conditions (Including the certifications and assurances that are agreed upon by the program at the time of application submission.) 131

D. Notice of Grant Award 131

E. Approved Grant Application and Budget 131

F. Request for Proposals (RFP) and Application Instructions 131

G. AmeriCorps Grant Agreement 131

H. The National and Community Service Act of 1990 as amended by the Serve America Act 132

I. Financial Management Resources 132

6.3. Financial Management 133

6.4. Policies and Procedures 135

A. Financial Systems Start-Up Checklist (Serve WI) 135

B. General Policies 136

C. Required AmeriCorps Policies 138

D. Travel 138

E. Member Living Allowance 138

F. AmeriCorps Staff Timekeeping 140

G. Contractual and Consultant Services 141

H. Internal Controls 141

I. Procurement and Purchasing 141

J. Record Retention and Destruction 141

K. Other Key Policies 142

6.5. Internal Controls 143

A. Budget Control Policies 143

B. Financial Management Systems 143

C. Administrative/Indirect Costs 144
6.6. Documenting Expenses 147
A. General Federal Requirements 147
B. In-Kind Resources 147
6.7. Program Match (45 CFR 2521.35- 45 CFR 2521.90 and CNCS Single Match FAQ) 149
A. Matching Levels 149
B. Matching Requirements (45 CFR 2543.23) Cost Sharing or Matching 150
6.8. Budgeting & Reporting 152
A. Grant Period (Terms and Conditions) 152
B. Budgeting 152
C. Budget Modification 152
D. Financial Reporting 153
E. Serve Wisconsin Financial Reporting Schedule 157
F. Direct and Indirect costs 158
G. Notice to Serve Wisconsin 159
6.9. Estimated Unexpended Funds Report 163
6.10. Fiscal Desk Review – Not Applicable to Fixed Amount Programs 164
6.11. Audit Requirements 165
6.12. Grant Closeout 166

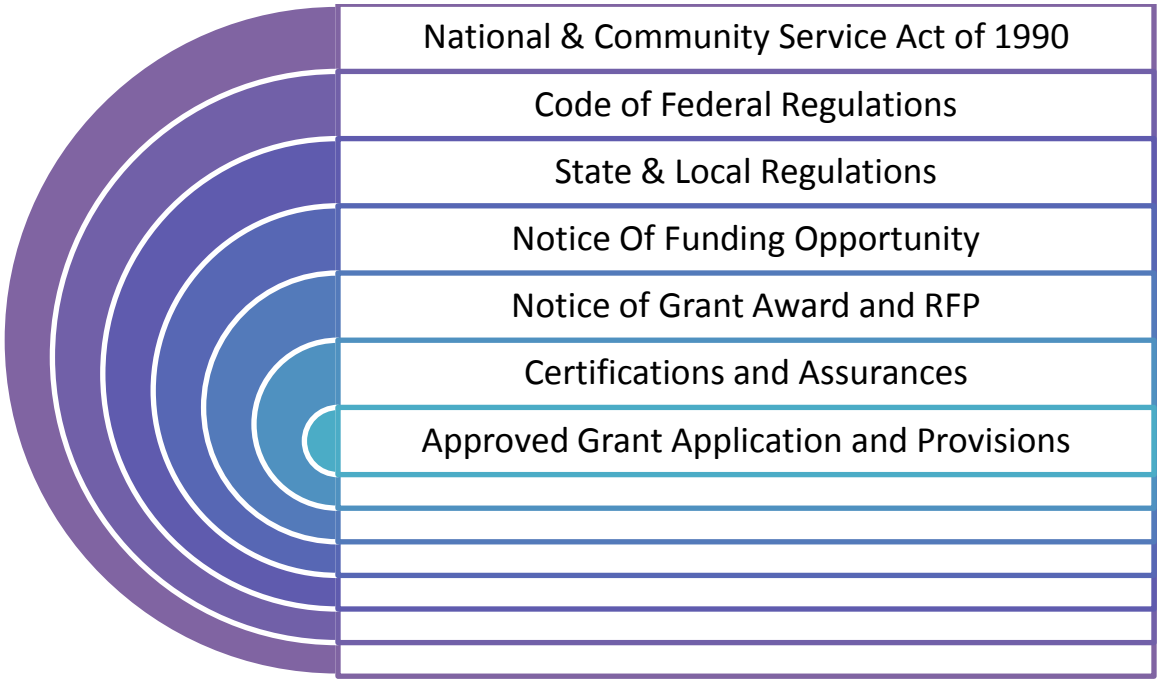
6.1. Grant & Financial Management Overview

The grantee has full fiscal and programmatic responsibility for managing all aspects of grant and grant-supported activities, subject to the oversight of Serve Wisconsin. It is important for there to be a clear understanding that grant and financial management are inextricably linked. That is, poor member and program management have negative impacts on financial management because compliance issues often result in disallowed costs. It is the responsibility of all staff to be aware of effective grants and financial management standards, be good stewards of federal resources by practicing strong financial, grant, program and member management and to work to continually improve the systems and practices used in these areas.

The grantee is accountable to Serve Wisconsin and CNCS for its operation of the Serve Wisconsin AmeriCorps Program and the use of AmeriCorps funds. Although programs are encouraged to seek the advice and opinion of the Commission on special problems that may arise, such advice does not diminish the program's responsibility for operating decisions.

6.2. Regulations & Requirements

Effective financial management of an AmeriCorps program requires familiarity and reference to numerous documents that detail the requirements and provide guidance on implementation of the various components of the program. This manual provides an overview, but programs are expected to review the financial management documents on a regular basis to ensure program compliance and continuous improvement.



A. Code of Federal Regulations

i. 45 CFR

45 CFR Subtitle B, Chapter XXV contains the regulations for the Corporation for National and Community Service. Sections in these regulations were amended to update National Service Criminal History Check regulations. Below is a table of some notable topics and where they can be found in the regulations.

Topics	Citation in the AmeriCorps Regulations
Member Service Activities	§2520.20 - §2520.55
Prohibited Activities	§2520.65

Tutoring Programs	§2522.900-2522.950
Matching Funds	§2521.35-2521.90
Member Benefits	§2522.240-2522.250
Calculating Cost Per Member Service Year (MSY)	§2522.485
Performance Measures	§2522.500-2522.650
Evaluation	§2522.500-2522.540 and §2522.700-2522.740
Selection Criteria and Selection Process	§2522.400-2522.475

If there is any inconsistency between the AmeriCorps regulations, the *RFP,* and the Application Instructions, the order of precedence is as follows:

1. AmeriCorps regulations 45 CFR §§ 2520–2550 take precedence over the
2. *Request for Proposals,* which takes precedence over the
3. Application Instructions.

ii. 2 CFR

To deliver on the promise of a 21st-Century government that is more efficient, effective and transparent, the Office of Management and Budget (OMB) is streamlining the Federal government's guidance on Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards. This reform of OMB guidance will reduce administrative burden for non-Federal entities receiving Federal awards while reducing the risk of waste, fraud and abuse.

This final guidance supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in OMB guidance); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up. The final guidance consolidates the guidance previously contained in the aforementioned citations into a streamlined format that aims to improve both the clarity and accessibility. This final guidance is located in Title 2 of the Code of Federal Regulations.

The Uniform Guidance took effect on December 26, 2014. The preamble will provide you with an overview of the major changes from previous OMB guidance. Fixed Amount awards are not subject to the cost principles in 2 CFR, Part 220, Subpart E. Fixed Amount awards must comply with the remaining Terms and Conditions of 2 CFR Part 220, including Subpart F relating to audit requirements. Fixed Amount awards include Education Award program (EAP) Fixed Amount

awards, Professional Corps Fixed Amount awards, Full-Time Fixed Amount awards, and Partnership Challenge awards.

It seems like it would go without saying, but it is very important that you read this guidance. Organizations should follow the guidance based on what the organization can be classified as (ex. Institutions of higher education, nonprofit organizations, etc.)

B. State and Local Regulations

These often have implications on financial management practices, documentation, employment status of members, and subsequent coverages, etc. Each program is expected to comply with all federal and state laws.

C. Grant Terms and Conditions (Including the certifications and assurances that are agreed upon by the program at the time of application submission.)

Terms and Conditions are the guiding principles for CNCS-funded grants. Make sure you are reviewing both the Terms and Conditions for AmeriCorps State and National Grants and the General Terms and Conditions.

D. Notice of Grant Award

Reviewing the notice of grant award from the Corporation documents the purpose of the award, the budget and performance periods, and the terms of acceptance.

E. Approved Grant Application and Budget

Your approved grant application as it exists in eGrants is a binding document. The grantee agrees to operate the funded program in accordance with the approved grant application and budget, supporting documents, and other representations made in support of the approved grant application. As such, the application should be referred to often, and for certain changes, it is required that you notify your assigned Program Officer (see section G. Notice to Serve Wisconsin).

F. Request for Proposals (RFP) and Application Instructions

These contain specific financial details that change on an annual basis (such as the maximum living allowance).

G. AmeriCorps Grant Agreement

The Grant Agreement issued by Serve Wisconsin that governs the grant in Wisconsin contains specific reporting deadlines and other details. The Grant Agreement binds the program to comply with its approved grant application (including the certifications and assurances to which the program agrees to at the time of application) and the Corporation's regulations and Terms and Conditions, which are incorporated by reference into the grant agreement. In addition, the Notice of Funding Opportunity/RFP and Application Instructions are also incorporated by reference into the Grant Agreement.

H. The National and Community Service Act of 1990 as amended by the Serve America Act

Signed by President Bush, this legislation authorizes grants to schools to support service-learning through Serve America and demonstration grants. Learn and Serve America is created. In 2009 this was amended by the Serve America Act to expand and strengthen national service programs.

I. Financial Management Resources

The Financial and Grants Management Institutes (FGMI) are higher level trainings that aren't always surrounding finance. To find session documents from the 2015 FGMI please click this link.

Materials from the Financial and Grants Management Institute 2012 can be found here.

6.3. Financial Management

Below is a list of systems and activities that are important for strong financial management.

i. Prepare and analyze consistent, timely and accurate financial reports on at least a quarterly basis

ii. Maximize segregation of financial duties to serve as a checks and balances system. System should be appropriate to the size of the organization's financial and human resources. The system should ensure adequate documentation is kept and organized.

iii. Adopt written financial procedures to monitor major expenses.

iv. Periodically assess risks and purchase appropriate levels of insurance to prudently manage liabilities and protect assets.

v. For nonprofit organizations, a written process for determining compensation for organization's executive and other key employees. Process must include: review and approval by independent persons, comparability data and contemporaneous substantiation of the deliberation and decision.

vi. Prohibit loans to board members, Executive Director, and key personnel.

vii. Board members or financial and executive leadership should clearly understand how to read and interpret financial statements.

viii. Comply with all federal, state and financial regulations.

ix. Complete required state and federal returns/reports (such as 990, Secretary of State Report) in a timely and accurate manner, including specific information about the relevant year's activities and outcomes. Board of directors and key leadership should receive a copy of the report.

x. Organizations whose federal expenditures for the organization's fiscal year exceed $750,000 must have a single or program-specific audit conducted for that year.

xi. All organizations receiving AmeriCorps funds must follow the audit/financial review requirements in Agreement Addendum #1 of the AmeriCorps Grant Agreement.

xii. Designate an audit committee to hire the auditor, oversee the audit process, meet with the auditor to review the audit report and present the audit to the Board for its review and approval. (Nonprofit organizations)

xiii. Have systems/mechanisms in place to protect individuals who report financial misconduct from any negative repercussions for doing so.

xiv. Provide annual financial statements and returns to constituents and others who request it.

xv. Avoid recurring deficits and secure adequate funding to carry out mission and activities. Expend funds responsibly in compliance with conditions attached to funding.

xvi. Ensure that assets are used solely for the benefits of the organization and not personal or other gains. Clear conflict of interest policy should be employed and reviewed and approved annually. Nonprofits that invest in, contribute assets to or participate in a joint venture with a taxable entity are required to have a written policy or procedures regarding this arrangement to ensure proper steps are taken to safeguard the organization's exempt status.

6.4. Policies and Procedures

All programs should operate under a set of written financial management procedures. Upon request, these policies should be available for review by the CNCS, Serve Wisconsin, or other party acting on Serve Wisconsin's behalf.

A. Financial Systems Start-Up Checklist (Serve WI)

____ Become familiar with applicable sections of 2 CFR

Agencies receiving federal funding should have on hand and be familiar with Title 2 of the Code of Federal Regulations.

____ Set up an AmeriCorps account

The AmeriCorps account must be a separate account or have a separate account number. All Corporation grant awards must be tracked separately. Devise a system to reconcile the grantee budget with the approved Corporation budget included with the award.

____ Create a system for the disbursement of stipends

Members must receive their stipends in equal installments over the term of service. The stipend is not dependent on the number of hours worked in any service period. Remember that the stipend is taxable.

____ Create a documentation system for staff time

You must have signed individual time distribution records for staff members who will be charged to the grant (in whole or in part) that allow you to identify all of their time and that segregate costs chargeable to the grant (distinguishing between administrative and programmatic functions) and costs not chargeable to the grant (such as fundraising).

____ Ensure that you have appropriate liability insurance

Programs must have sufficient liability insurance to protect the organization, employees, and members. Members engaged in both on- and off-site project activities must be covered. You should review your current policies to ensure they cover non-employees in special statuses, such as members.

____ Track in-kind services

You are responsible for tracking in-kind services from partners and from your own agency. This includes donated items as well as staff time.

____ Track cash match

A system must be developed to track your cash match. Your program is expected to meet your operating costs match by the end of the program year.

B. General Policies

i. Reasonable, Allocable and Allowable

Procedures shall be established for determining reasonableness, allocability, and allowability of costs, in accordance with applicable cost principles and terms of the grant. Procedures shall be applied consistently across all programs

i. **Reasonable:** To be reasonable, a cost must meet the following criteria:

- Is consistent with the judgment of any prudent person under the circumstances prevailing at the time the cost is incurred or allocated.
- Is generally recognized as ordinary and necessary for the operation of the grant or program, or cost objective being charged.
- Is consistent with sound business practices, established laws and regulations, and terms of the program being charged;
- Is consistent with the market price for comparable goods or services.
- Any deviation from established practices by the entity is explained and justified.
- Be authorized, or not prohibited, under state or local laws or regulations.
- Conform to any limitations or exclusions set forth in these principles, federal laws, or other governing limitations to type or amount of cost items.
- Be accorded consistent treatment through application of generally accepted accounting principles appropriate to the circumstances.
- Not be allocable to or included as a cost of any other program in either the current or a prior period.
- Be net of all applicable credits.
- Be adequately documented.

ii. **Allocable:** A cost that can be assigned or charged to one or more activities or items (cost objects) on the basis of benefits received or other such equitable or logical association, although a direct (causal) relationship may not be established. A shared cost that is allocable to a particular program may not be shifted to another program in order to avoid a funding deficiency, restriction imposed by regulation, rule or contract, or for any other reason not reflective of benefit received. A shared cost is allocable:

- Based on its relative benefits received
- If it is treated consistently with other costs incurred for the same purpose in like circumstances and if it:
  - Is incurred specifically for the award
  - Benefits both the award and other work and can be distributed in a reasonable proportion to the benefits received
  - Is necessary to the overall operation of the organization

iii. **Allowable:** To be allowable, costs must:

- be necessary and reasonable for the proper and efficient administration of the

Serve Wisconsin AmeriCorps Program,

- conform to grant award limitations or cost principles,
- be consistent with policies and procedures that apply to the federal and non-federal activities of the organization,
- be included in the approved program budget,
- be given consistent treatment,
- be in accordance with Generally Accepted Accounting Principles (GAAP),
- not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program, and
- be adequately documented.

iv. **Unallowable Costs**

Unallowable costs are detailed in the relevant federal regulations. Please note: In some cases, writing of the AmeriCorps grant may not be an allowable activity that can be charged as an expense or match to the AmeriCorps grant. Program officials should review the appropriate section of 2 CFR referenced above to determine whether the cost is allowable. **If not allowable, the program should charge grant-writing time to a cost center that is unconnected to the AmeriCorps grant, such as a general fund. In cases where charges are unallowable, grant writing activities should be separated on the program director's timesheet to document that grant writing was not charged to the AmeriCorps grant.**

a. Staff Fundraising (45 CFR 2520.60)

AmeriCorps staff members' time and related expenses may not be charged to the CNCS (federal) or Grantee share (match) while engaged in organized fund raising, including financial campaigns, endowment drives, general solicitation of gifts and bequests, door-to-door solicitations, direct mail or similar activities for which the sole purpose is raising capital or obtaining contributions for the organization. Expenses incurred to raise funds may be paid out of the funds raised or an agency general fund.

Staff time and effort spent on raising matching resources should be incidental to the overall management of the program, and should be focused primarily on developing and disseminating information to potential funders on the Serve Wisconsin AmeriCorps Program and its achievements. Staff can make presentations and educate funders on objectives, goals and accomplishments. Efforts to involve the community in support of the AmeriCorps program, such as obtaining medical contributions or assistance at a health fair; donations of building supplies for an AmeriCorps construction project; and coordinating community participation in and support of a serve-a-thon and service activities are also allowable. Development officers and fund-raising staff are not allowable expenses.

b. AmeriCorps Grant Writing

Depending on the type of organization, writing of the AmeriCorps grant may not be an allowable activity for the AmeriCorps Program Director (meaning that the time spent writing the grant cannot be charged to the federal share or counted as match towards the AmeriCorps grant). In order to determine if this applies to your organization, the program should refer to the section of 2 CFR that pertains to their agency to determine the status of their grant writing time. For those who determine that grant writing is not allowable, their agency should designate an alternate cost center (with non-federal funds) to which they can charge their time spent writing the grant. Most agencies have a general fund that would be appropriate for these expenses. If applicable, the Program Director should document time spent on grant writing in a separate funding column on their timesheet.

C. Required AmeriCorps Policies

The organization shall ensure that the relevant required AmeriCorps policies are incorporated into organizational policies or maintained in a section of the overall policies to meet the Serve Wisconsin requirements. (Examples of required AmeriCorps policies include: staff and member criminal history record check, member grievance procedures, members being required to wear AmeriCorps gear, member service projects, etc.)

D. Travel

Procedures shall be established that detail allowable travel for staff and board members, including travel approval process, reimbursement rates and process, and travel limitations. Serve Wisconsin requires that all grantees budget a minimum of $2,000 each grant year to support travel for program staff to attend a Serve Wisconsin approved training.

E. Member Living Allowance

In September 2005, the Corporation for National and Community Service rewrote the AmeriCorps Terms and Conditions including a section outlining the living allowance distribution. The Terms and Conditions dated September 6, 2005 include the following language:

i. Living Allowances, Other In-Service Benefits and Taxes

Requirements related to member living allowances and benefits are in 45 C.F.R.§§2522.240 and 2522.250. In addition, the following apply:

a. Living Allowance Distribution.

A living allowance is not a wage. Programs must not pay a living allowance on an hourly basis. Programs should pay the living allowance in regular increments, such as weekly or bi-weekly, paying an increased increment only on the basis of increased living expenses such as food, housing, or transportation. Payments should not fluctuate based on the number of hours served in a time period, and must cease when a member concludes a term of service.

If a member serves 1700 hours but is permitted to conclude a term of service before the originally agreed upon date, the program may not provide a "lump sum" payment to the member. Similarly, if a member enrolls after the program's start date, the program must provide regular living allowance payments from the member's start date and may not increase the member's living allowance incremental payment or provide a lump sum to "make up" any missed payments.

b. Living Allowance Procedures

In the Terms and Conditions dated 9/6/05, the Corporation for National and Community Service clarified some living allowance distribution procedures. The second paragraph of the living allowance Terms and Conditions states the following:

- Lump sum payments to members who decide to leave their service term early are not allowed.
- Members who start their term of service after the program's start date are not eligible to receive stipend payments that would have been made between the program's start date and the member's start date.

A member's living allowance should be distributed fairly and equitably and would be the same for the same member position. For example, if a program's start date is September 1, 2005, assuming that the full-time living allowance is $12,100, each full-time member that is enrolled should be paid $1008 a month. If a member is enrolled in September, but leaves the program in July, the member should only receive 11/12 of the living allowance or $11,091. Even if the member completed all requirements of the program including serving 1700 hours.

Similarly, if a member is enrolled in November and completes in August, the member should only receive 10/12 of the living allowance or $10,083.

Programs should identify a specific program design(s) (i.e. a specific length for the member term of service) in the program's application. For example, if full-time members are required to serve their terms in 10 months, then the program may pay the full living allowance (e.g., $12,100) over ten months. If a program's 300-hour members are required to complete their terms in 3 months, then the program may disburse the full living allowance (e.g., $2,400) over three months. If a member does not complete his/her term of service within the amount of time designated, and the program extends the member's term, then the member must complete his/her service hours with no additional living allowance payments.

Programs may have members of the same position type receive different living allowance amounts so long as it is determined the members are in different positions. For example, an AmeriCorps program normally enrolls members in September for a half-time position, but had situations where members were

starting in January also in a half-time position. Both groups of members were expected to serve until July 31st and their member agreement reflects this term of service. Furthermore, the members in the September to July term are engaged in different/more activities than the members serving January to July, which could mean the members are in different positions. Members in different positions and in the same position type can be paid different living allowance amounts per pay period and ultimately be paid the total budgeted amount of living allowance for their HT position.

If you have any questions about how to determine the amount a member should be paid per pay period or about creating a living allowance distribution policy please contact your Serve Wisconsin Program Officer.

ii. Living Allowance FAQs

F. AmeriCorps Staff Timekeeping

i. Time & Effort Distribution (timekeeping)

Procedures shall be established that ensure all staff that are charged as federal share or match to the grant have fully executed timesheets (can be electronic) to detail allocation to the grant. The timesheet must show actual time spent by program, agree with one or more pay periods and must show all time worked during that period.

a. Code of Conduct for Employees Engaged in the Award and Administration of Grants and Contracts

A written code of standards for conduct shall be maintained by the program and shall govern the proper behavior and performance of officers, employees, members, volunteers or agents in conducting the work of the organization. The code of conduct should encourage ethical behavior, accountability and transparency while discouraging or prohibiting unethical behavior, discrimination, breaches of confidentiality, and other undesirable, dangerous, or illegal behavior.

A code of conduct will typically include, at a minimum, rules covering the following issues:

- dress code,
- illegal drug use,
- criminal convictions and their impact on employment,
- laws and regulations,
- confidentiality,
- discrimination
- use of the agency's property
- how to report illegal, unethical or questionable behavior
- conflicts of interest practices, which ensures that conflict of interest is avoided in the procurement and utilization of all AmeriCorps-related goods and services

(including placement/award of members). These standards shall provide that no officer, employee, or agent shall:

- Solicit or accept gratuities, favors, or anything of monetary value from suppliers or potential suppliers
- Participate in the selection, award, or administration of a procurement (including a member position), where to the individual's knowledge, any of the following has a financial or other substantive interest in any organization which may be considered for award:
  - The person participating is an officer, employee, or agent of one of the organizations under consideration for an award
  - Any member of his or her immediate family (Immediate family is defined as: wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, grandparent, grandchild, stepparent, and stepchild)
  - A person or organization which employs any of the above or with whom any of the above has an arrangement concerning prospective employment

G. Contractual and Consultant Services

Contractual and consultant services under this grant should be procured consistent with 45 CFR Part 2543.44.

H. Internal Controls

Procedures shall be established that maintain internal cash control records to ensure safeguarding of assets, reliability of financial information and compliance (including procedure for monitoring variances in budget, to identify why variances occurred and to make budgetary adjustments).

I. Procurement and Purchasing

Procedures shall be established that detail the requirements for purchasing and procurement of supplies and equipment, including property management procedures for inventory, control, insurance and disposition of items purchased with federal funds. Equipment inventory must be verified annually by the subgrantee.

J. Record Retention and Destruction

Procedures shall be established that stores, secures and maintains records for the required period of time and that ensure that records can be obtained and presented for review during monitoring or audit.

As noted in grant contracts, programmatic and financial records for AmeriCorps programs funded through Serve Wisconsin must be retained for three years beyond the date of final closeout of the Serve Wisconsin Prime application under which programs were funded.

Refer to the Closeout folder in Basecamp to see two documents, the Records Retention Chart and the Records Retention Schedule to determine whether your program may dispose of records for a particular grant year. It is encouraged that you consult your Serve Wisconsin Program Officer before deleting records to confirm the retention period has passed.

K. Other Key Policies

The following additional policies are recommended for effective grant and program management. These policies should be made available to Serve Wisconsin staff, or its agents, upon request.

- Payroll
- Cash Receipts and Disbursements
- Closeout of Sub-grants/Contracts
- Delegation of Authority Policy
- Cash Drawdown and Reimbursements
- Site Management and Monitoring

6.5. Internal Controls

A. Budget Control Policies

Budget controls assure that you keep within the parameters of the submitted budget and that you have adequate resources to implement and complete the program. Examples of these policies include:

- Regular monitoring of budget figures by comparing them to actual year-to-date and current period expenditures or outlays.
- Process for recording and explaining any budget variations that are unexpected or unusual and determining necessary adjustments.
- System in place that utilizes organizational monitoring and reporting to accurately project unexpended funds and adequately plan for their use (including through approved budget modification, if required) or report them to Serve Wisconsin for reallocation to future AmeriCorps programming.
- Method to ensure that budgeted matching requirements are met and that the administrative matching remains within allowable rates. (Not applicable for fixed-amount grantees.)
- Process for requesting prior approvals for budgetary modifications when necessary. (Not applicable for fixed-amount grantees.)
- Ability to accurately track, expend and report program match as required by federal regulations.
- Ability to obtain approvals, track, and report other federal funds used as match to the AmeriCorps grant.

B. Financial Management Systems

A financial management system based on sound management policies and procedures shall be established and maintained to effectively control and account for all grant funds, including maximum segregation of financial duties. Segregation of duties refers to having various accounting functions handled by different personnel in order to minimize the risks of criminal acts, financial oversights, etc. For example, it is recommended that one person receive financial donations while another staff member deposits these donations at the bank. Such procedures shall ensure safeguards for assets and shall assure that such assets are used solely for authorized purposes.

The grantee must maintain financial management systems that include:

- standard accounting practices,
- sufficient internal controls,
- a clear audit trail,
- written cost allocation procedures (as necessary),
- the ability to distinguish expenditures attributable to this grant from expenditures not attributable to this grant,
- accounting for each award/grant separately,
- identification of costs by programmatic year and by budget category, and
- Differentiation between direct and indirect costs or administrative costs.

C. Administrative/Indirect Costs

The term *administrative cost means* general or centralized expenses of overall administration of an organization that receives assistance under the Act and does not include program costs. For organizations that have an established indirect cost rate for Federal awards, administrative costs mean those costs that are included in the organization's indirect cost rate. Such costs are generally identified with the organization's overall operation and are further described in 2 C.F.R. Part 200. For organizations that do not have an established indirect cost rate for Federal awards, administrative costs include:

- Accounting, auditing, contracting, budgeting and general legal services
- Facility occupancy costs (e.g. rent, utilities, insurance, taxes, maintenance)
- General liability insurance (not directly related to a program)
- Directors and Officer's liability insurance
- Depreciation on building and equipment
- Office supplies
- General and administrative salaries and wages

Costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy may be charged directly. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect (F&A) costs.

Unless otherwise agreed upon by Serve Wisconsin, programs must remain within the maximum CNCS administrative share percentage (as noted in the approved budget) during each reporting period. It should be noted that administrative percentages are based on actual expenditures; if the entire budget is not expended, then the amount which can be charged to administrative costs is reduced proportionately.

Programs may charge indirect costs to the AmeriCorps grant when they can demonstrate that the indirect cost rate is based on costs which benefit AmeriCorps objectives and provide documentation, such as Federally Approved Indirect Cost Rate Letter or cost allocation plan to support the basis of their claim.

The administrative budget section for AmeriCorps grants offers two options for budgeting:

Method	**Federal Requirement**	**Notes**
Federally Negotiated Indirect Cost Rate	2 CFR §200.414 (c) Federal Agency Acceptance of Negotiated Indirect Cost Rates	May apply for one time extension for up to four years
State Negotiated Indirect Cost Rate	2 CFR §200.414 (c) Federal Agency Acceptance of Negotiated Indirect Cost Rates	

De minimis rate of 10% of *Modified Total Direct Costs* (MTDC)	2 CFR §200.414 (f) de minimis rate of 10% of MTDC	• May be used indefinitely • Can only use if **never** had a negotiated indirect cost rate. • Not available to State/Local Gov. with over $35 million in direct federal funding
Direct Charge	2 CFR §200.413 Direct Costs	Admin & clerical salaries should normally be treated as indirect (F&A) costs. Direct charging of these costs may be appropriate only if all of the following conditions are met: services are integral to a project or activity; Individuals involved can be specifically identified with the project or activity; costs are explicitly included in budget or have the prior written approval of awarding agency; and The costs are not also recovered as indirect costs. (2 C.F.R. § 200.413(c))
5% Federal Share/10% Match Administrative	45CFR §2510.20 and § 2521.95 Administrative Costs	See application instructions.

i. Federally Approved Indirect Cost Rate (FAICR)

Is an administrative rate that is negotiated with the cognizant federal agency (the federal agency from which your organization receives the majority of its federal funds). To obtain an indirect cost rate, a grantee must submit an indirect cost proposal to its cognizant agency and negotiate an indirect cost agreement. Indirect costs may only be charged in this category when there is a Federally Approved Indirect Cost Rate in effect. In the case of a FAICR, the AmeriCorps program may charge up to the maximum federal share allowed in the AmeriCorps grant application instructions. In addition, they may show up to the remaining FAICR as grantee share in the budget. Organizations with a FAICR must submit a copy of the FAICR letter with their AmeriCorps grant application. The FAICR letter serves as the documentation for the administrative costs section of the AmeriCorps budget.

a. CNCS Fixed Percentage Method

Organizations that do not have a federally-approved indirect cost rate may elect to utilize the Fixed Percentage method. Under this method, programs may charge up to the maximum federal share allowed in the AmeriCorps grant application instructions. In addition, they may show up to 10% of the total (federal + grantee share) of budget sections I and II as matching resources in the grantee share column of section III of the budget.

b. De minimis rate of 10% of Modified Total Direct Costs

Any non-Federal entity that has never received a negotiated indirect cost rate, except for those non-Federal entities described in 2 C.F.R Appendix VII to Part 200—States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b, may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely.

(See 2 C.F.R. §200.414(f))

6.6. Documenting Expenses

A. General Federal Requirements

All costs reported on the financial report must be necessary for achievement of the AmeriCorps goals and activities as described within the grant and have adequate source documentation on file supporting those costs and the costs must be traceable to the agency's books of account. As required by the Federal Regulations and/or Office of Management and Budget (OMB) Circulars, AmeriCorps grant funds must be segregated from other agency expenses and tracked by grant year in the financial system. Separation by agency fiscal year or calendar year does not satisfy the AmeriCorps funding requirements.

All accounting records (including match and in-kind contributions) shall be supported with properly authorized source documentation such as time and attendance reports, canceled checks, invoices, paid bills, or grants and sub grants awarded. Records shall be maintained which adequately identify the source and application of funds for grant supported activities. Records shall be maintained that trace funds to a level of expenditure adequate to establish that funds have not been used to violate the restriction imposed by the grant. Further, financial information shall be maintained to show the relation of expenditures or matching resources to performance or productivity. Serve Wisconsin requires that the program certify in writing that matching funds for these costs are from non-federal or approved federal sources on an annual basis. The program is responsible for obtaining a similar written certification from their sites or financial contributors. In addition, program match and Federal Funds used as Match must be reported on the Match Report & AFR at regular reporting intervals. See specific information on Federal Funds used as match in 6.8. Budgeting & Reporting in this chapter.

B. In-Kind Resources

The organization is required to maintain adequate documentation to support amounts claimed as match. The same documentation is required for both CNCS share and grantee share. Documentation must meet the same standards as other expenditures within the organization. In-kind donations must be valued based on fair market price. That is, the price that item would sell for on the open market or what it would cost to obtain similar goods or services. The donor must provide the value of the donation and the organization should ensure that the value is reasonable.

i. **Basis for determining the valuation** for personal service, material, equipment, buildings and land shall be documented. Financial records related to in-kind resources should be maintained at the same level as the cash contributions. If the programs' books of account do not allow for tracking of in-kind donations, the program should utilize a separate spreadsheet to track in-kind donations on a monthly basis for reporting in the program's Periodic Expense Reports, AFR, and financial desk review.

ii. **Documentation of in-kind resources** must enable the donor to attest to the value of the contribution. The following information should be contained on the in-kind donation form:

- Name and signature of donor
- Date and location of donation
- Detailed description of item or service

- Estimated value of contribution, how value was determined, who made the determination
- Whether the contribution was obtained with Federal funds

6.7. Program Match (45 CFR 2521.35- 45 CFR 2521.90 and CNCS Single Match FAQ)

All cost reimbursement grant programs are expected to meet the matching requirements as outlined in the approved budget. (Please note: there is no match requirement for fixed amount grant programs (Education Award Only and Full-Time & Professional Corps Fixed Amount).

The chart below details the minimum matching requirements, which are based on the grant year cycle. Please note that while the AmeriCorps Regulations refer to match requirements in specific budget categories, in recent years the CNCS appropriations legislation has dictated that programs meet only an overall matching requirement, known as "single match." Programs should reference the NOFO and Application Instructions they used when preparing their application for details on applicable matching requirements. Programs should refer to eGrants to access the years of program operation and verify their matching obligations.

	Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 5**	**Year 6**	**Year 7**	**Year 8**	**Year 9**	**Year 10 (+)**
Minimum Overall Share	24%	24%	24%	26%	30%	34%	38%	42%	46%	50%

A. Matching Levels

i. Budgeted Match

The grant contract requires that programs meet the budgeted matching level. If a program anticipates that it will not be able to meet the matching level proposed, a budget modification should be requested from Serve Wisconsin no later than May 1st for the current program year. Concerns regarding matching requirements will be shared with the Serve Wisconsin Board in consideration for continued program funding.

ii. Statutory/Required Match

If a program fails to meet the matching requirements or administrative costs restrictions listed below, the Commission will notify the Program Director in writing of the situation and request that the situation be rectified within the current or next reporting period. If there are on-going issues related to match, the commission may notify other staff members, including the financial officer and/or authorized representative of the agency. The Commission may suspend payment of the reimbursement request(s) until the situation is corrected and reported appropriately in OnCorps. In addition, as merited, the issue may be brought to the attention of the Serve Wisconsin Board and/or CNCS.

B. Matching Requirements (45 CFR 2543.23) Cost Sharing or Matching

All contributions, including cash and third party in-kind, shall be accepted as part of the program's cost sharing or matching when such contributions meet all of the following criteria:

i. Are verifiable from the program's records.
ii. Are not included as contributions for any other federally-assisted project or program.
iii. Are necessary and reasonable for proper and efficient accomplishment of project or program objectives.
iv. Are allowable under the applicable cost principles.
v. Are not paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost sharing or matching.
vi. Are provided for in the approved budget.
vii. Conform to other Terms and Conditions of the Regulations and OMB Circulars, as applicable.
viii. Unrecovered indirect costs may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency.
ix. Volunteer services furnished by professional and technical personnel, consultants, and other skilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for volunteer services shall be consistent with those paid for similar work in the program's organization. In those instances in which the required skills are not found in the program organization, rates shall be consistent with those paid for similar work in the labor market in which the program competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, allowable, and allocable may be included in the valuation.
x. When an employer other than the program furnishes the services of an employee, these services shall be valued at the employee's regular rate of pay (plus an amount of fringe benefits that are reasonable, allowable, and allocable, but exclusive of overhead costs), provided these services are in the same skill for which the employee is normally paid.
xi. Donated supplies may include such items as expendable equipment, office supplies, laboratory supplies or workshop and classroom supplies. Value assessed to donated supplies included in the cost sharing or matching share shall be reasonable and shall not exceed the fair market value of the property at the time of the donation.
xii. Values for program contributions of services and property shall be established in accordance with the applicable cost principles. If a Federal awarding agency authorizes programs to donate buildings or land for construction/facilities acquisition projects or long-term use, the value of the donated property for cost sharing or matching shall be the lesser of:
    - The certified value of the remaining life of the property recorded in the program's accounting records at the time of donation, or
    - The current fair market value. However, when there is sufficient justification, the Federal awarding agency may approve the use of the current fair market value of the donated property, even if it exceeds the certified value at the time of donation to the project.
xiii. The method used for determining cost sharing or matching for donated equipment, buildings and land for which title passes to the program may differ according to the purpose of the award:

- If the purpose of the award is to assist the program in the acquisition of equipment, buildings or land, the total value of the donated property may be claimed as cost sharing or matching, or
- If the purpose of the award is to support activities that require the use of equipment, buildings or land, normally only depreciation or use charges for equipment and buildings may be made. However, the full value of equipment or other capital assets and fair rental charges for land may be allowed, provided that the Federal awarding agency has approved the charges.

xiv. The value of donated property shall be determined in accordance with the usual accounting policies of the program, with the following qualifications.

- The value of donated land and buildings shall not exceed its fair market value at the time of donation to the program as established by an independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of the program.
- The value of donated equipment shall not exceed the fair market value of equipment of the same age and condition at the time of donation.
- The value of donated space shall not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.
- The value of loaned equipment shall not exceed its fair rental value.

6.8. Budgeting & Reporting

A. Grant Period (Terms and Conditions)

i. Competitively Funded Programs

CNCS competitive grants cover a three-year project period, containing three budget periods (one year each). Continued funding is contingent upon satisfactory performance and the availability of funds. Therefore, competitive programs will submit a continuation application for each budget period contained within the project period as described in the current year's Application Instructions and NOFO/RFP. At the beginning of each new three-year budget period, a full application is required.

ii. Formula Funded Programs

Programs funded by state formula grants are awarded on a one-year basis. Formula programs will complete a full application on an annual basis as described in the application instructions and NOFO/RFP and continued funding will be based upon the grant application, program performance, program management and availability of funds. All formula granted programs are expected to implement continuous improvement in an effort to obtain competitive funding.

B. Budgeting

An effective budget is a planning tool or guide for the financial support of the AmeriCorps grant and must be: realistic, consistent and flexible. Budgeting is not an annual process, but rather an ongoing review of actual costs. This process allows for proactive action to be taken to address shortfalls or unanticipated revenues.

C. Budget Modification

Before and during the program year, you have the ability to modify aspects of your program. Some modifications require that you notify Serve Wisconsin staff, others require that you ask that Serve Wisconsin and the Corporation for National and Community Service approve your modification request. Information on Program Modification changes can be found with your program's contract supporting documents.

Refer to the Budget Modification Guidelines and Sample Budget Modification Request Spreadsheet for budget modification information and steps. A request letter (can be via email), submitted by an authorized program representative, must be received by Serve Wisconsin before formal consideration will be given to a request. Budget modification requests can be submitted to Serve Wisconsin any time during the program year up to May 1st of that program year.

i. Budget Modifications

The Grantee must obtain the prior written approval before amending the approved budget in any of the following ways:

- Specific Costs Requiring Prior Approval Before Incurrence under 2 CFR part 220, 2 CFR part

225, or 2 CFR part 230). For certain cost items, the regulations require approval of the awarding agency for the cost to be allowable. Examples of these costs are overtime pay, rearrangement and alteration costs, and pre-award costs.

- Purchases of equipment over $5,000 using Grant funds, unless specified in the approved application and budget.
- Adding expenses to one or more major budget lines that were initially budgeted and approved for $0 of expenditure. The major budget lines are: I.A. – Personnel Expenses; I.B. – Personnel Fringe; I.C. – Travel; I.D. – Equipment; I.E. – Supplies; I.F. – Contractual & Consultant Services; I.G. – Training; I.H. – Evaluation; I.I. – Other Program Operating Costs; II.A. – Living Allowance; II.B. – Member Support Costs; and III – Administrative/Indirect Costs.
- Changes to cumulative and/or aggregate budget line items that amount to 10 percent or more of the total program budget must be approved in writing in advance by Serve Wisconsin. Depending on the circumstances, CNCS approval may also be required. The total program budget includes both the Corporation and Grantee shares. Grantees may transfer funds among approved direct cost categories when the cumulative amount of such transfers does not exceed 10 percent of the total program budget.

  For example, Test Program's total program budget is $500,000, thus 10 percent of that is $50,000. Test Program had budgeted $10,000 for other operating costs and $5,000 for supplies. The program has grossly overspent in each line item and reports $30,000 and $25,000 for other operating costs and supplies respectively. No budget modification is required as the transfers do not exceed 10 percent of the total budget.

However, in situations that are not noted above as needing prior approval, it is not necessary to request a budget modification when the Grantee has a CNCS or Grantee Share balance as a result of unfilled or vacated positions, as long as the Grantee continues to match at the budgeted match percentage.

ii. Modifications to Grantee Share – Minimum Aggregate Match

In the event that the Grantee is unable to meet their budgeted aggregate match, the Grantee may submit a budget modification request no later than May 1st of that program year. If necessary, a budget modification request will be forwarded to CNCS for review/approval.

The Grantee will receive a letter or email from Serve Wisconsin staff indicating that the budget modification was approved or rejected. The Grantee shall not utilize a modified budget until written notification from Serve Wisconsin has been received. OnCorps includes an online budget modification request form. If following the above procedures results in a budget modification request being approved by Serve Wisconsin and/or CNCS, Serve Wisconsin will notify the Grantee to submit the budget modification request in OnCorps.

D. Financial Reporting

The following information is to be used in conjunction with the grant agreement and is intended as a guideline to programs. Reporting programmatic progress and challenges is of mutual benefit to both the grantee and the Serve Wisconsin; it helps to assess program goals, ensures members will have access to

the full benefits of their AmeriCorps participation, provides justification of expenses, allows for reimbursement by Serve Wisconsin and enables Serve Wisconsin to be aware of and report upon the progress of programs. Regular reporting is required within the Serve Wisconsin grant award and failure to report in a timely manner can result in punitive action, up to and including revoking of the grant award. Timeliness and accuracy of reporting will be a consideration of the Serve Wisconsin Board for future funding recommendations.

AmeriCorps grantees are required to report expenditures and matching resources on a monthly or quarterly basis to Serve Wisconsin.

Reporting to Serve Wisconsin must be:

- By grant year (not agency fiscal year, state/federal fiscal year or calendar year)
- Based on actual expenditures, not budgeted or estimated amounts.
- Directly from the agency's general ledger/books of account.
  - If in-kind matching resources are tracked separately from the general ledger, they must be recorded in a separate spreadsheet and a formal written explanatory policy and supporting procedures must be in place.
- Accrual basis is preferred reporting method. Accrual is the accounting basis that brings items to account as they are earned or incurred (and not as cash received or paid) and includes them in financial statements in the related accounting period. If records are not maintained on an accrual basis, accrual data for reports may be developed on the basis of an analysis of the documentation on hand. In such cases, the accounting process must provide sufficient information to compile data to satisfy the accrued expenditure reporting requirements and to demonstrate the link between the accrual reports and actual books of account. Such documentation shall be retained for audit purposes.
- Done through OnCorps or Approved Fixed Amount Invoice.

The following financial reports will be collected from grantees. Reporting requirements may vary by grant type. Specific reporting procedures and screen shots from OnCorps (the reporting system) are included on the Resources page in the OnCorps system.

i. Reimbursable Grantees

Reimbursable Grantees will primarily use OnCorps to submit financial information. Programs can choose to submit their Periodic Expense Reports (PER) monthly or quarterly. Aggregate Financial Reports (AFRs) and Match Reports are due quarterly. The estimated unexpended funds report (reports anticipated unexpended funds), Program Closeout, and electronically providing a copy of your Annual Audit Report occurs at least once a year. A full Fiscal Desk Review will occur when required but no less than every three years.

Financial Reporting Requirements- Reimbursable Grantees

Fixed Amount grants programs (Education Award Only and Full-Time Fixed & Professional Corps Fixed, do not complete the following forms.

- **Periodic Expense Reports form (PER)** to request reimbursements or advance payments
- **Aggregate Financial Report (AFR)**** Provides aggregate funding information and includes:
  - Federal Share
  - Grantee Share
- **Match Report****

  Grantees are required to report amounts and sources of match funding, including federal funds, other than those provided by the Corporation, used to carry out their programs. For example, if a program is receiving host-site contributions, it must detail in the Program Match Report what amount of those host-site contributions is being claimed in the PER.

  Match includes other federal funds expended by grantees and operating sites. This requirement should be included in site agreements. CNCS has obtained written authorization from the following federal agencies which details the terms under which their funds can be used as match:

  - Dept. of the Interior (conservation corps and similar programs)
  - Admin. On Aging (use of Title III E funds to support similar activities)
  - Dept. of Education
    - Title I, part A Elementary & Secondary Education Act
    - School Improvement Grants
    - Race to the Top
    - I3 Awards
    - High School Graduation Initiative
    - Full Service Community Schools
    - Promise Neighborhoods
    - 21st Century Community Learning Centers

- **OnCorps AFR Instructions for Reporting Whether Other Federal Funds Were Used as Match – Once each program year, in the AFR for the period ending September 30th (at the end of the program year)**

  Enter one of the following statements, 1 or 2, into the Remarks field as appropriate:

  1. No federal funds other than funds from the Corporation were used to carry out the program(s) funded under this grant during the preceding 12 months (October 1 through September 30).
     - If you entered statement A, you have completed your reporting regarding other federal funds.

  OR

  2. Sources and amounts of federal funds other than funds from the Corporation used to carry out the program(s) funded under this grant during the preceding 12 months (October 1 through September 30) are as follows:

- If you entered statement B, enter the data described below using one line for each source of other federal funds. Use a semicolon to separate each data element as shown below, without any spaces between data elements and the semicolons. Enter a hard-return break to create a blank line.
  - Enter the eGrants subaward number
  - The name of the other federal agency (without abbreviation)
  - The other federal agency grant or contract number
  - The Catalogue of Federal Domestic Assistance (CFDA) number or "N/A" if a contract
  - The cumulative amount expended towards the AmeriCorps program from that source in whole dollars, rounded to the nearest dollar.

  A sample report follows:

  "Sources and amounts of federal funds other than funds from the Corporation used to carry out the program(s) funded under this grant during the preceding 12 months (October 1 through September 30) are as follows:

  12ACHWI001000; Department of Health and Human Services; Grant ABCDEF; CFDA 88.888; $50,567

  12ACHWI001000; Department of Labor; Grant 234567; CFDA 99.999; $25,333

  12ACHWI001000; Department of Agriculture; Contract 123456; N/A; $1,000

  12ACHWI001000; Department of Education; Grant XYZ123; CFDA 11.111; $90,199"

- Estimated unexpended funds report (reports anticipated unexpended funds) – See Section 9
- Fiscal Desk Review when required – See Section 6.10
- Annual Audit Report - See Section 6.11
- Closeout Report – See Section 6.12

**** For a step-by-step guide on Quarterly AFR and Match Reporting please refer to the Serve Wisconsin Subgrantees OnCorps Instructions for Quarterly Financial Reporting**

ii. Professional Corps Full-Time Fixed Amount, Full-Time Fixed Amount, and Education Award Only Grantees

Professional Corps Fixed Amount, Full-Time Fixed Amount, and Education Award Only programs will not be required to track or report expenditures, however they will be required to request payment based on enrolled members and/or hours served.

Fixed Amount and Education Award Only grantees are not required to report program match, however, they are expected to follow generally accepted accounting principles to account for all revenues, including grant-related program income.

Financial Reporting Requirements- Fixed Amount Grantees

- **Fixed Amount Program Invoice**
  Fixed Amount grants allow for a fixed amount per individual member service year (MSY) that is enrolled in a national service position. The advantage to fixed amount grants is less financial reporting; however, as fixed amount payments are based solely on the number of approved hours completed by enrolled members during a specified time period, the program will not receive all funds if a member does not complete successfully, or if the program does not enroll all of the awarded positions.

  Each year fixed amount grantees will receive an invoice spreadsheet from their Serve Wisconsin Program Officer along with instructions detailing how the invoice is to be completed. Please refer to those documents. Invoice instructions are also stored on Basecamp.

- **Advance Payment**
  Full-Time Fixed Amount and Professional Corps Fixed Amount programs may draw up to 20% of their grant award at the beginning of the program year to cover initial costs associated with recruiting, selecting, and training members. After that, programs may draw regular payments <u>not to exceed the number of member hours served</u>. These advance payments are then repaid each invoice period. The deadline for submitting advance payment requests will be specified in annual grant agreement documents.

- **Annual Audit Report** (See Section 6.11)
- **Closeout Report** (See Section 6.12)

iii. Financial Reporting Requirements- Education Award Only Grantees (EAP)

For Education Award programs (EAP), the fixed federal assistance amount of the grant is based on the approved and awarded number of full-time (MSYs) members specified in the award. For EAPs, the final amount of grant funds that the grantee may request is dependent upon the number of members that the subgrantee has enrolled. Once members have been enrolled in eGrants, programs may submit an invoice requesting the funds associated with each enrolled member.

E. Serve Wisconsin Financial Reporting Schedule

Staff looking for a frequently updated calendar should go to Basecamp. A generalized schedule is provided below:

<u>Report</u>	<u>Due Date</u>
Advance Payment Requests	

Advance Payment Requests (if eligible and desired)[5]	***As specified in annual grant agreement***
Aggregate Financial Reports[6]	
Reporting Period	
Agreement Start Date (varies per program) – December 31, 201X	**January 20, 201X**
January 1 – March 31, 201X	**April 20, 201X**
April 1 – May 1, 201X	**July 20, 201X**
July 1 – September 30, 201X	**October 20, 201X**
October 1 – December 31, 201X (if a program has an extension)	**January 20, 201X**
Budget Modification Requests	
Budget Modification Requests	**May 1, 201X**

Important Reminders

- Reimbursement requests for approved expenses incurred for AmeriCorps member special events or meetings must be submitted no later than **60 days** after the event has occurred.
- Unless otherwise noted, all items should be submitted to Your Program Officer by the above dates.

F. Direct and Indirect costs

The total cost of a grant is comprised of the allowable direct cost incident to its performance, plus its allocable portion of allowable indirect costs, less applicable credits. There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the grant or other ultimate cost objective. It is essential, therefore, that each item of cost for the AmeriCorps Program be treated consistently as either a direct or an indirect cost. Specific guidelines for determining direct and indirect costs allowable under grants are provided below.

i. Charging of Direct Costs

Direct costs are specific expenses related to the operations of a specific project. Direct costs are those costs that are readily assignable to the AmeriCorps Program. Direct costs may be charged as a total cost of a specific service to the AmeriCorps Program or may be a shared cost. Typical direct costs chargeable to grants include:

- Allowable direct expenses for members (living allowance, FICA, health care, worker's compensation)

[5] Education Award Programs, Professional Corps Fixed Amount Programs, and State Agencies are not eligible for Advance Payment Requests.
[6] Education Award Programs, Professional Corps Fixed Amount Programs, and Full-Time Fixed Amount Programs are not required to submit Aggregate Financial Reports.

- Costs for staff who train, place or supervise members
- Evaluations of programs or other services furnished specifically for the grant by other agencies, provided such charges are consistent with criteria outlined in these principles
- Supplies and facilities costs (including member gear with the AmeriCorps logo)
- Travel
- Training

Supplies with individual item cost of $1,000 or more require approval from Serve Wisconsin. In making a determination of approval, Serve Wisconsin will consider: a) whether the item is included specifically in the grant, b) whether the bid is acceptable based on equipment specifications, availability and other reasonable considerations; and c) whether the cost is necessary, reasonable and allocable to AmeriCorps.

ii. Charging of Indirect Costs

Indirect costs are general expenses related to overall administration of an organization receiving CNCS funds incurred for common/joint objectives that cannot be readily identifiable with a particular project or cost objective. See Section C. Administrative/Indirect Costs for more information on indirect costs.

A cost may not be allocated to an award as an indirect cost if any other cost incurred for the same purpose, in like circumstances, has been assigned to an award as a direct cost. For example, if you charge your accountant's time to the AmeriCorps grant as a direct cost, you cannot charge his/her time as an indirect cost to your other programs/grants or awards.

G. Notice to Serve Wisconsin

In addition to regular reporting, the grantee must notify Serve Wisconsin when other conditions arise. Some examples of these situations are noted below. Other notifications are related to member and program management and these are covered in other areas of this handbook.

i. Developments or Delays (Terms and Conditions)

The Program Director or other program representative will notify the appropriate Serve Wisconsin Program Officer immediately of any developments or delays that have a significant impact on funded activities, any significant problems relating to the administrative or financial aspects of the grant, or any suspected misconduct or malfeasance related to the grant or grantee. The Program Director or official will also inform the Serve Wisconsin official about the corrective action taken contemplated by the program and any assistance needed to resolve the situation.

ii. Waste, Fraud, and Abuse (Terms and Conditions)

Programs must immediately contact the OIG and their program officer when they first suspect that:

1. A criminal violation has occurred (see 18 U.S.C. Part I for more information on criminal conduct.), such as:

a. Criminal fraud.
b. Theft or embezzlement.
c. Forgery.
d. Corruption, bribery, kickbacks, or acceptance of illegal gratuities or extortion.

2. Actual or suspected fraud, waste, or abuse has occurred.
   a. Fraud involves obtaining something of value through willful misrepresentation.
   b. Waste involves the taxpayers not receiving reasonable value for money in connection with any government funded activities due to an inappropriate act or omission by players with control over or access to government resources.
   c. Abuse involves behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary business practice given the facts and circumstances. Abuse also includes misuse of authority or position for personal financial interests or those of an immediate or close family member or business associate.

iii. Programmatic Changes (45 CFR 2543.25) and AmeriCorps Program Modification Guidelines)

The grantee must obtain the prior written approval of Serve Wisconsin before making the following changes in the approved program. Some changes may also require prior approval by CNCS:

- **Scope or Goals of the Program**
  Changes in the scope or goals of the program, whether or not they involve budgetary changes.

- **Performance Measures**
  Changes to the approved program performance measures.

- **Key Personnel**
  Changes in key personnel identified in the application or award document (this includes all staff listed on the budget under federal share or match).

- **Reduction or Absence of Program Director**
  The absence for more than three months, or a 25% reduction in time devoted to the project, by the approved project director; programs must have an interim director identified and available during extended absences. No program can operate without an AmeriCorps Program Director.

- **Changes in Member Supervision**
  Substantial changes in the level of member supervision, including addition or loss of program sites.

- **Contracting or Sub-Granting AmeriCorps Activities**
  Entering into sub-grants or contracting out any Wisconsin AmeriCorps program activities funded by the grant and not specifically identified in the approved application.

- **Change in Program Design**
  Including the following changes:
  - Converting full-time positions to part-time positions and vice versa
  - Changing a member status from full-time to part-time or vice versa

- **Exiting a Member for Compelling Personal Circumstance**
  Programs must request prior approval to exit a member early for compelling personal circumstances. See D. Early Termination for Compelling Personal Circumstances for more on exits for Compelling Personal Circumstances.

iv. Budgetary Changes (45 C.F.R. 2543.25)
See also: 6.8. Budgeting & Reporting and C. Budget Modification

Expenditures to the grant should be "ordinary and necessary" as well as detailed within the budget narrative and/or narrative portions of the AmeriCorps grant application. It is recommendable for programs to communicate with their assigned Program Officer about changes to their budget or when they determine that their actual expenditures are differing largely from budgeted amounts. As mentioned above, the grantee must request prior approval from Serve Wisconsin and CNCS, including but not limited to, the following reasons:

- **Items not included in budget**
  Items not described or accounted for within the budget require approval from the Serve Wisconsin. (For example, if the program did not budget for purchase of a piece of equipment, but determines a need for such equipment and wants to purchase it using AmeriCorps funds. Sub-grants or contracts not included in approved application and budget (2 CFR § 200.331-332);

- **Budgetary changes related to changes in the scope or goals of the project**

- **The need for additional federal funding**

- **Transfer from indirect to direct costs**
  The transfer of amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa.

- **Costs requiring prior approval**
  Under OMB Cost Principles 2 CFR Part 200, Subpart E. For certain cost items, the cost principles require approval of the awarding agency for the cost to be allowable.

Examples of these costs are overtime pay, rearrangement and alteration costs, and pre-award costs.

- **Transfer or subcontract of work under an award**
  The transfer, sub-award or contracting out of any work under an award; (This does not apply to purchase of supplies, material, equipment or general support services.)

v. Exceptions to Policies

Exceptions must be requested in writing from the Serve Wisconsin Program Officer. The Commission may withhold payments or take other actions as outlined in the Grant Agreement if program reports are late, inaccurate or out-of-compliance (i.e. matching requirements not met).

6.9. Estimated Unexpended Funds Report

Prior to issuing annual Competitive and Formula grant awards, CNCS sends Serve Wisconsin requests for estimates of unexpended funds for each of Serve Wisconsin's Prime AmeriCorps program grants. CNCS uses this information to determine if Serve Wisconsin has any anticipated unexpended funds to be returned to CNCS.

To obtain the necessary information to report to CNCS, Program Officers will send an email to each of the programs under a particular Prime and ask for an estimate of anticipated unexpended funds for the current program year. Programs should report as accurately as possible anticipated unexpended funds at the time the email is received. Each program reporting anticipated unexpended funds will be held to not expending the amount of funds reported to Serve Wisconsin.

6.10. Fiscal Desk Review – Not Applicable to Fixed Amount Programs

Serve Wisconsin will conduct financial reviews for programs with reimbursable budgets. The plan is to conduct reviews for any program(s) that will are new to Serve Wisconsin's portfolio, plus additional programs based on assessed risk and/or other considerations, so that approximately one-third of the portfolio of reimbursable budget programs is reviewed each year.

6.11. Audit Requirements

The Grantee is required to submit audit reports to the Wisconsin Department of Administration according to the requirements set forth in Article 32 of the Grant Agreement. The Grantee shall have a certified annual audit performed using Generally Accepted Accounting Principles and Generally Accepted Auditing Standards. The audit shall include funds passed through the Board and expended by the Grantee.

To find more information on State Single Audit Requirements (SSAG), please click here. Once that page is loaded you will click on link for most recent year, then scroll down to SSAG section for Dept. of Administration/Bureau of Financial Management guidance

Records of the Grantee, subgrantee, if any, and contractors relating to this Agreement shall be available for review or audit upon request by the Board or the Board's duly authorized representatives. Additional copies of audits may be requested during the grant application required along with the submission of a grant application.

6.12. Grant Closeout

Upon the completion of each program year, Serve Wisconsin creates a Program Year End File for each program. Each program will be notified when the annual Serve Wisconsin Closeout Form is due to be submitted in OnCorps. Serve Wisconsin Program Officers complete a checklist to ensure the following for each program:

- Final PER & Final AFR (OnCorps) completed and approved. Please refer to the OnCorps Instructions for Quarterly Financial Reporting document for a statement that must be included in your final AFR
- All AmeriCorps members exited from the program in My AmeriCorps Portal and OnCorps
- Final Progress Report completed, including "Final Results" for each performance measure for the entire program year, except for National PMs that have a target measured up to one year after members finish the program.

Final Invoice must meet the following requirements:

- CNCS Share of Administrative costs should be 5.26% or less
- Grantee Share of Administrative costs should be 10% or less or if organization as a federal indirect cost rate, administrative costs should be equal to or less than the indirect cost rate
- Total match should be equal to or greater than commitment

Statement of Advance Interest

- If the program received an advance, the program has submitted a statement regarding interest earned over the period of the grant and a check to DOA for any amount over $250.00 (retain a copy of the check, if applicable).

Sources:

Financial & Grants Management Institute, 2010

CNCS Resources Website (https://www.nationalservice.gov/resources)

Chapter 7 – AmeriCorps Program Monitoring

Contents

7.1. Monitoring Overview 168

A. Ongoing Communications 168

B. Official Guidance Memos 168

C. Progress Reports 169

D. Financial Reports 169

7.2. Monitoring Types and Tools 170

A. Serve Wisconsin Monitoring Activities 170

B. Fiscal Monitoring Activities by DOA and External Auditor 172

7.3. Timeline for Use of Monitoring Tools 173

7.4. Official Monitoring Visits 174

A. Program Monitoring Timeline 174

B. Other Information 175

C. Significant Concerns Regarding Program Operation 175

D. Criminal Activity (including Waste, Fraud or Abuse) 176

7.1. Monitoring Overview

Serve Wisconsin monitors sub-grantees throughout the program year to ensure compliance with the Terms and Conditions and regulations of the grant and to evaluate the quality of the services provided to the community and the AmeriCorps members. (Hereafter, sub-grantees will be referred to as "programs.")

Wisconsin AmeriCorps programs are monitored through ongoing communication, report reviews, and monitoring visits by Serve Wisconsin Program Officers.

The Serve Wisconsin staff is committed to communicating clear expectations, providing timely guidance, focusing on both compliance and quality issues, and helping programs continuously improve their operations and impact.

Though the Serve Wisconsin staff uses a variety of methods to monitor AmeriCorps programs, the following criteria are used when assessing programs:

- New or continuing grantee
- Prior federal or state awards and programs
- Past history of or previous performance
- Results of A-133 or other audit
- Staffing patterns
- Prior site visits and findings
- Monitoring/compliance issues
- Adequacy and timeliness of program and financial reports
- Responsiveness to Serve Wisconsin staff

A. Ongoing Communications

Each program is assigned to a Serve Wisconsin Program Officer. The program officer is responsible for being familiar with the program's staff, performance measures, program design, management strategies, service site locations, strengths, and areas for improvement. The program director is expected to contact his/her Serve Wisconsin Program Officer with questions and concerns. Ongoing communications include as-needed contact by phone, email or standard mail. Copies of email messages and letters are kept in the appropriate program's correspondence file for the relevant program year.

B. Official Guidance Memos

Periodically, Serve Wisconsin sends a memo to program directors in which an AmeriCorps Provision or other requirement is clarified and/or emphasized. Often this happens as a result of one program's question about a provision, which then leads the Corporation for National and Community Service (CNCS) to provide a clarification or an interpretation of that provision. Other times, a program is found to be in violation of a provision and thus in an attempt to avoid future violations by other programs, the Serve Wisconsin staff issues an official guidance memo. Please familiarize yourself with the topics that

the guidance memos address in order to reference them in times of need. The guidance memos can be found in the Program Resources section.

C. Progress Reports

The program is required to submit Progress Reports in the OnCorps online reporting system. The beginning date of the program's first Progress Report will automatically be the program's Agreement start date. The end of each reporting period MUST be the end of a "regular" quarter. For example, the end of the first reporting period is December 31, although a program's start date might be September 1, and September 1 through December 31 is more than three months long.

All progress report due dates shall be met. If a report is received after a due date and the program has not requested and been granted an extension, it is possible that the program's next reimbursement request will be delayed. Furthermore, a program's ability to meet due dates is evaluated by Serve Wisconsin as part of its monitoring process and will be considered as part of a program's performance during the grant application process. Reporting due dates are specified in Agreement Addendum #1.

For more on quarterly progress reports see section 4.3. Performance Measures & Progress Reports (45 CFR 2522.530- 45 CFR 2522.650)

D. Financial Reports

Periodic Expense Reports (PERs), Aggregate Financial Reports (AFR) and Program Income Reports (Match Reports) are submitted to Serve Wisconsin in the OnCorps online reporting system quarterly during the official program year. This does not apply to Education Award Programs (EAP), Professional Corps Fixed-Amount Programs, and Full-Time Fixed-Amount Programs.

For more on financial reports, see section 6.8.D. Financial Reporting.

7.2. Monitoring Types and Tools

Serve Wisconsin staff, the Department of Administration (DOA), external auditors, and AmeriCorps program staff utilize various monitoring tools and documents in order to ensure compliance with Federal and State regulations. Serve Wisconsin posts these tools, forms, and documents publicly in the interest of transparency. It is the program's best interest to utilize these documents to ensure that their records and procedures are in compliance. You can find the most recent versions of the monitoring tools on the Serve Wisconsin Website and on Basecamp.

A. Serve Wisconsin Monitoring Activities

i. Document Review

For new programs, and then once every three years, programs will undergo a document review. While most programs will only experience a document review once every three years, Serve Wisconsin may conduct Document Reviews as often as necessary. Prior to Serve Wisconsin's Official Monitoring visits, program staff will be asked to gather document materials as indicated on the Document Review Checklist. These materials are to be prepared for Serve Wisconsin staff prior to their arrival.

ii. Member Eligibility Review

Serve Wisconsin staff reviews the eligibility of all members for all programs to serve as an AmeriCorps member. Programs utilize the Member Eligibility Confirmation Form (DOA-14000 (R 11/2011)) to document a member's eligibility criteria including citizenship or permanent resident status, age, High School/GED completion, and signed certification by the member and program staff. Alternately, a program may rely on the electronic verification of the citizenship or permanent resident status and Social Security Number through the MyAmeriCorps Portal, but will still have to use the Member Eligibility Confirmation Form.

Serve Wisconsin staff will request a copy of each Member Eligibility Confirmation Form prior to the annual site visit or at a time unrelated to timing of the annual site visit. Forms will be reviewed, and a summary of results with any corrections to be made will be sent.

Additionally, it is the program's responsibility to ensure that all members' citizenship status and SSN have been electronically verified by viewing each member's record in the Portal. If any have a status that is not verified, the program must work with the National Service Trust in order to manually verify the information. Please see section B. Member Eligibility Documentation (Terms and Conditions - Specific IX.B and Regulations 45 CFR 2522.200) for more information on how to resolve this issue. AmeriCorps members are not eligible to receive their education award until this is resolved.

iii. Member File Review

One of the most important items reviewed by Serve Wisconsin staff is the member file. Each member must have their own file that contains the required information on the Member File Checklist, with the exception of the National Service Criminal History Check files—these files

must be kept in a separate file in a locked cabinet. (Please see Chapter 5 – Member Management for more details.) Serve Wisconsin encourages programs to complete the Member File Checklist themselves to ensure that all documentation is in order.

Member file reviews are conducted on-site. Your program officer will select a minimum of 15% of the current members' files (or a minimum of 6, whichever is larger) to review, as well a minimum of 2 files to review from the previous program year. The members selected will be indicated in the Program Assessment (see below).

iv. Member/Supervisor Interview & Member Focus Group

Serve Wisconsin staff may choose to interview one or more of your members and/or supervisors. This is often done at the member's or supervisor's host site.

v. Performance Measure Review

This monitoring review is completed for new programs and every three years thereafter. Two performance measures from the current program year and one performance measure from the previous year (if applicable) are selected by Serve Wisconsin staff. At the on-site monitoring visit, program directors will answer questions regarding the progress towards meeting each PM and will provide information and copies of the data collection tools used to measure each PM.

vi. Program Assessment & Supplemental Questionnaire

This review is completed for every program annually. Serve Wisconsin staff completes most of this form prior to the on-site monitoring visit. This includes the need to follow up on any pending issues; program compliance with 30-day enrollment and exit requirement, term of service changes within 90 days, updated timesheets, assessment of program's responsiveness to inquiries and attendance at meetings/events, etc. This is also where staff will indicate which member files will be reviewed (see Member File Review above). Program staff has the opportunity to answer any questions Serve Wisconsin staff may have, clarify any non-compliance issues, and give any other information about the program.

Serve Wisconsin staff will send the program director a supplemental questionnaire prior to the on-site monitoring. This questionnaire lists the AmeriCorps Prohibited Activities (45 CFR § 2520.65) and requires the director to certify whether their AmeriCorps members are participating in any of the prohibited activities. This is collected during the on-site monitoring visit.

vii. Program Director & Financial Director Interviews

These interviews are conducted for new programs, for programs that had a change in staff, or if the program is assigned to a new Serve Wisconsin Program Officer. These interviews provide an in-depth look at the program, how it operates, how members are managed and what services they are performing, communications with host sites (if applicable), compliance with financial regulations/Terms and Conditions, and more. Serve Wisconsin Program Officers may request more information for any of the interview questions for which the answer was unclear.

B. Fiscal Monitoring Activities by DOA and External Auditor

i. Fiscal Desk Review

Based on Serve Wisconsin's Monitoring Plan, staff or an outside contractor may conduct a fiscal desk review after requesting detailed expenditure information from the program for a particular month/quarter. Source documentation for sample expenditures is also requested and reviewed. The Document Review Checklist-Fiscal Only form is used to gather initial information from the program on finances for a specified period.

ii. Audit Review

Department of Administration (DOA), Division of Administrative Services staff is responsible for reviewing all programs' most recent audit reports in compliance with 2 CFR Subpart F. If an audit is not required, other audit reports/financial statements may be used. See 6.11. Audit Requirements for more information.

7.3. Timeline for Use of Monitoring Tools

Monitoring Tool	Timing	Where	Form
Financial Risk Assessment	For New Programs	Dept. of Administration	FMS – completed with application
Audit Review	Annually, as received	Dept. of Administration	Audit – provided by program
Fiscal Reports	Monthly/Quarterly, as applicable	Serve Wisconsin	Submitted by program in OnCorps
Progress Report Review	Quarterly (3-4, as applicable)	Serve Wisconsin	Submitted by program in OnCorps
Program Assessment	All programs, annually	Serve Wisconsin	Program Assessment & Questionnaire
Member File Review	All programs, annually	On-site	Member File Review Checklist
Member Eligibility Review	All programs, all members, annually	Serve Wisconsin	Eligibility Review
Document Review	All new programs, and every 3 years for existing programs. May be conducted if there are extensive document changes	Serve Wisconsin	Document Review Checklist – Program Document Review Form – Serve WI
Fiscal Desk Review	All new programs and approx. 1/3 of existing cost-reimbursement programs annually	Serve Wisconsin	Document Review Checklist (Fiscal) - Program
Performance Measure Review	All new programs, and every 3 years for existing programs	On-site	Performance Measure Review
Program Director Interview	New programs or change in program or Serve WI staff	On-site	Program Director Interview
Financial Director Interview	New programs or change in program or Serve WI staff	On-site	Financial Director Interview
Member Survey	All members, annually	Serve Wisconsin	Online Member Survey
Member/Supervisor Interview or Member Focus Group	As necessary – these are optional monitoring tools	On-site	Member & Supervisor Interview Forms; Member Focus Group Form

You can find the most recent versions of the monitoring tools on the Serve Wisconsin Website and on Basecamp.

7.4. Official Monitoring Visits

A. Program Monitoring Timeline

During the program year, Serve Wisconsin Program Officers usually conduct at least one on-site monitoring visit and follow up visit(s) if necessary. Serve Wisconsin Board Members may be involved in certain components of the visit.

Some monitoring activities take place in the Serve Wisconsin office (e.g., reviewing progress reports and OnCorps Periodic Expense Reports), and some require a visit to the program. The Serve Wisconsin Program Officer will determine when on-site visits are appropriate.

During a monitoring visit, the program officer's monitoring activities may include: the program's compliance with the AmeriCorps Terms and Conditions, progress towards meeting performance measures, program operation/management, and member and host site satisfaction. Based on the risk level assigned to the program, the monitoring required may be different. One part of the visit may serve as the "compliance monitoring visit" and takes place at the program's headquarters or administrative office. Another part of the visit may be the "service site visit" and takes place at one or more sites where members perform service.

Before any monitoring procedure:

- The program officer contacts the program director on an individual basis to schedule monitoring dates. The program officer then follows up with the program director in writing, by email, or over the phone to finalize the monitoring procedure that will take place and the date(s). At this time the program officer will send the Program Assessment Supplement – Prohibited Activities Questionnaire to the program and a checklist of documents requested to programs that need a document review.
- A monitoring visit agenda, directions to the program's headquarters and service sites that will be visited are prepared before the visit.
- The program officer will request copies of all member eligibility forms for members enrolled to date in order to review prior to the monitoring visit with the exception of returning members. Alternately, the member eligibility confirmation form review may take place without regard to timing of a monitoring visit.
- The program officer will run all OnCorps and My AmeriCorps Portal reports for the applicable program years and select which current and prior year member files to review during the visit.

During the visit:

- The program officer follows up on issues raised during previous monitoring visits or during the program year that have not yet been resolved.
- The program officer follows up on issues that require a sample to be taken (e.g., member files).
- The program officer reviews and discusses the monitoring visit tools (e.g., Program Director

Interview, Program Assessment, etc.) with appropriate program staff members.

- The program officer reviews a portion of member files and national service criminal history check files from the current and most recent complete program year.
- The program officer collects requested documents for the Document Review (if applicable) and the completed Program Assessment Supplement—Prohibited Activities Questionnaire from the program director(s).

After the visit:

- If a program is found to be in violation of key compliance issues, the program officer immediately follows up with the program director to start the correction process. This should be done at the completion of the visit or should be completed soon after the visit, either through a phone call or email with the program director.
- The program officer will create a monitoring feedback report that will include programmatic and fiscal items for continuous improvement and identify all compliance issues and the required action of the program. The program officer will provide a deadline for the program to respond to the feedback report.
- Upon receipt of a program's response to the monitoring visit feedback report, the program officer reviews the response and follows up with the program director to gain additional information if necessary. This follow up is documented in writing, usually in a letter or email.

If serious and chronic issues arise, the Serve Wisconsin executive director may work in tandem with the program officer to follow up with the program. This may include the executive director participating in on-site visits to the program or involvement of the board in compliance resolution.

B. Other Information

In addition, the Commission may request additional information to be reviewed (such as: performance measure collection tools, site supervisor training schedules and materials, member training materials) and will conduct regular review of on-line reporting systems, including OnCorps and eGrants.

C. Significant Concerns Regarding Program Operation

If significant concerns at a program or local site become apparent, a conference call, site visit, technical assistance visit or other means will be used by Serve Wisconsin to provide additional support and monitoring. In these cases, as much advance notice as possible will be provided to the program. Programs that are not in compliance are subject to suspension or discontinued funding according to the Grant Agreement.

If a program is found to be in violation of key compliance issues, the program officer immediately follows up with the program director to start the correction process. This should be done at the completion of the visit or should be completed soon after the visit either through a phone call or email with the program director. The program officer will provide a deadline for the program to complete the correction process.

D. Criminal Activity (including Waste, Fraud or Abuse)

If, at any time, the Serve Wisconsin suspects misconduct or malfeasance related to the grant or subgrantee/program, including waste, fraud, abuse or any violation of criminal law, the Serve Wisconsin will take appropriate and immediate steps to address these concerns, including suspension, or termination of the grant award, notification of the Corporation, Office of the Inspector General, Office of the Auditor - State of Wisconsin, and/or local law enforcement.

Chapter 8: Regulations and Other Grant Materials

Contents

8.1. Regulations, Terms and Conditions, and Other Grant Management 178

A. Web Links to Bookmark 178

8.2. Civil Rights and Equal Opportunity Requirements 179

A. Grant Program Civil Rights Policy 179

B. Direct Links to Policies and Guidelines 180

8.3. Serve Wisconsin Guidance Memos 181

8.4. Unemployment Insurance State Statutes 182

8.1. Regulations, Terms and Conditions, and Other Grant Management

It is your responsibility as a subrecipient of Federal funds to understand and follow all requirements and Terms and Conditions for your Federal award, including the laws and regulations that govern the award referenced in the Terms and Conditions of your grant award. The links below allow quick access to the regulations, Terms and Conditions, and other useful information for your AmeriCorps grant.

A. Web Links to Bookmark

- The National and Community Service Act of 1990, as amended by the Serve America Act
- AmeriCorps Regulations
  - Update to National Criminal History Check Regulations (October 5, 2012)
- AmeriCorps Terms and Conditions/Terms and Conditions – all years (make sure you are referencing the most recent Terms and Conditions)
- AmeriCorps Prohibited Activities
- Office of Management and Budget (OMB) Guidance
  - See sections regarding Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- AmeriCorps State and National Policy FAQs
- CNCS Notice of Current Federal Funding Opportunities
- National Service Knowledge Network
- Managing AmeriCorps Grants
- CNCS Mega Search Document
  - Note: This document combines many of those above to make searching for key terms easier. While efforts are made to keep information in the consolidated document current, please consult the primary sources for the most up-to-date information.

8.2. Civil Rights and Equal Opportunity Requirements

As with all federal grant programs, you must ensure that your programs or activities, including those of any sub-grantees, will be conducted, and facilities operated, in compliance with the applicable civil rights statutes and their implementing regulations. You must obtain assurances of such compliance prior to extending federal financial assistance to sub-grantees. For civil rights purposes, all programs and projects funded or receiving service members under the National and Community Service Act, as amended, are programs or activities receiving federal financial assistance

Please review and refer to the following Civil Rights/Equal Opportunity policies and guidelines.

A. Grant Program Civil Rights Policy

The Corporation for National and Community Service (CNCS) has zero tolerance for the harassment of any individual or group of individuals for any reason. CNCS is committed to treating all persons with dignity and respect. CNCS prohibits all forms of discrimination based upon race, color, national origin, gender, age, religion, sexual orientation, disability, gender identity or expression, political affiliation, marital or parental status, or military service. All programs administered by, or receiving Federal financial assistance from CNCS, must be free from all forms of harassment. Whether in CNCS offices or campuses, in other service-related settings such as training sessions or service sites, or at service-related social events, such harassment is unacceptable. Any such harassment, if found, will result in immediate corrective action, up to and including removal or termination of any CNCS employee or volunteer. Recipients of Federal financial assistance, be they individuals, organizations, programs and/or projects are also subject to this zero tolerance policy. Where a violation is found, and subject to regulatory procedures, appropriate corrective action will be taken, up to and including termination of Federal financial assistance from all Federal sources.

Slurs and other verbal or physical conduct relating to an individual's gender, race, ethnicity, religion, sexual orientation or any other basis constitute harassment when it has the purpose or effect of interfering with service performance or creating an intimidating, hostile, or offensive service environment. Harassment includes, but is not limited to: explicit or implicit demands for sexual favors; pressure for dates; deliberate touching, leaning over, or cornering; offensive teasing, jokes, remarks, or questions; letters, phone calls, or distribution or display of offensive materials; offensive looks or gestures; gender, racial, ethnic, or religious baiting; physical assaults or other threatening behavior; or demeaning, debasing or abusive comments or actions that intimidate.

CNCS does not tolerate harassment by anyone including persons of the same or different races, sexes, religions, or ethnic origins; or from a CNCS employee or supervisor; a project, or site employee or supervisor; a non-employee (e.g., client); a co-worker or service member.

It is expected that supervisors and managers of CNCS programs and projects, when made aware of alleged harassment by employees, service participants, or other individuals, to immediately take swift and appropriate action. CNCS will not tolerate retaliation against a person who raises harassment concerns in good faith. Any CNCS employee who violates this policy will be subject to discipline, up to

and including termination, and any grantee that permits harassment in violation of this policy will be subject to a finding of non-compliance and administrative procedures that may result in termination of Federal financial assistance from CNCS and all other Federal agencies.

Any person who believes that he or she has been discriminated against in violation of civil rights laws, regulations, or this policy, or in retaliation for opposition to discrimination or participation in discrimination complaint proceedings (e.g., as a complainant or witness) in any CNCS program or project, may raise his or her concerns with our Office of Civil Rights and Inclusiveness (OCRI). Discrimination claims not brought to the attention of OCRI within 45 days of their occurrence may not be accepted in a formal complaint of discrimination. No one can be required to use a program, project or sponsor dispute resolution procedure before contacting OCRI. If another procedure is used, it does not affect the 45-day time limit.

OCRI may be reached at (202) 606-7503 (voice), (202) 606-3472 (TTY), eo@cns.gov, or through http://www.nationalservice.gov/.

signature on file

Wendy Spencer, Chief Executive Officer

Date: 5/2013

B. Direct Links to Policies and Guidelines

Below are direct links to civil rights, harassment, and equal opportunity policies and guidelines.

- Civil Rights and Workforce Diversity Policy
- Grant Program Civil Rights and Non-Harassment Policy
- Employee Civil Rights and Non-Harassment Policy
- Non-Harassment Guidelines for CNCS Grantees
- Civil Rights Guidelines for CNCS Grantees on acceptable interview questions
- Disability Law for CNCS Grantees
- Accessibility Guidelines for CNCS Grantees
- Legal Responsibilities Regarding Persons with Disabilities Presentation
- Title VI of Civil Rights Act of 1964, Part 1203 – Non-Discrimination in Federally Assisted Programs
- Title VI of Civil Rights Act of 1964, Part 1232 – Non-Discrimination on Basis of Handicap in Programs Receiving Federal Assistance
- AmeriCorps and Fair Labor Standards Act – Guidance from U.S. Department of Labor
- Drug-Free Workplace Requirement – 41 U.S.C. § 702

8.3. Serve Wisconsin Guidance Memos

All of the guidance memos issued by Serve Wisconsin or CNCS can be found on Basecamp. These memos provide specific guidance on the following topics or issues:

- 16-Year-Olds Participating in Youth Corps Programs
- Enrolling AmeriCorps Members Who Are Concurrently Employees (or employing AmeriCorps members who are currently serving)
- Members Serving Two Consecutive Terms in the Same Program Year
- Exiting a Member for Compelling Personal Circumstances When the Member Leaves for an "Acceptable" Employment Opportunity
    - See also: Serve WI CPC Employment Form in Program Resources—Exiting Members
- CNCS Living Allowance Waiver Requests and Approvals
- Member Position Conversions & Corrections in MyAmeriCorps Portal
- Restrictions on Legislative Lobbying and Partisan Politics
- Youth Corps Programs' Use of Quarter-Time and Minimum-Time Slots
- Zero-Hour Timesheets and Additional Service Hours

8.4. Unemployment Insurance State Statutes

Below are resources detailing how AmeriCorps Members are exempt from unemployment insurance in the State of Wisconsin. The Final letter from the U.S. Department of Labor can be found on Basecamp under Program Resources, Financial Guidance.

- Wisconsin State Statute 108.02(15)(j) http://docs.legis.wisconsin.gov/statutes/statutes/108/02/15

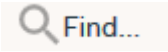
- 2005 Wisconsin Act 86, Amendments to Wisconsin Statutes Chapter 108, Unemployment Insurance Law (starts on page 7) http://docs.legis.wisconsin.gov/statutes/statutes/108/

- CNCS Frequently Asked Questions, C.23. *Is the grantee required to provide unemployment insurance?* http://www.nationalservice.gov/sites/default/files/documents/AmeriCorps_State_National_Policy_FAQs.pdf

Chapter 9: Program Resources

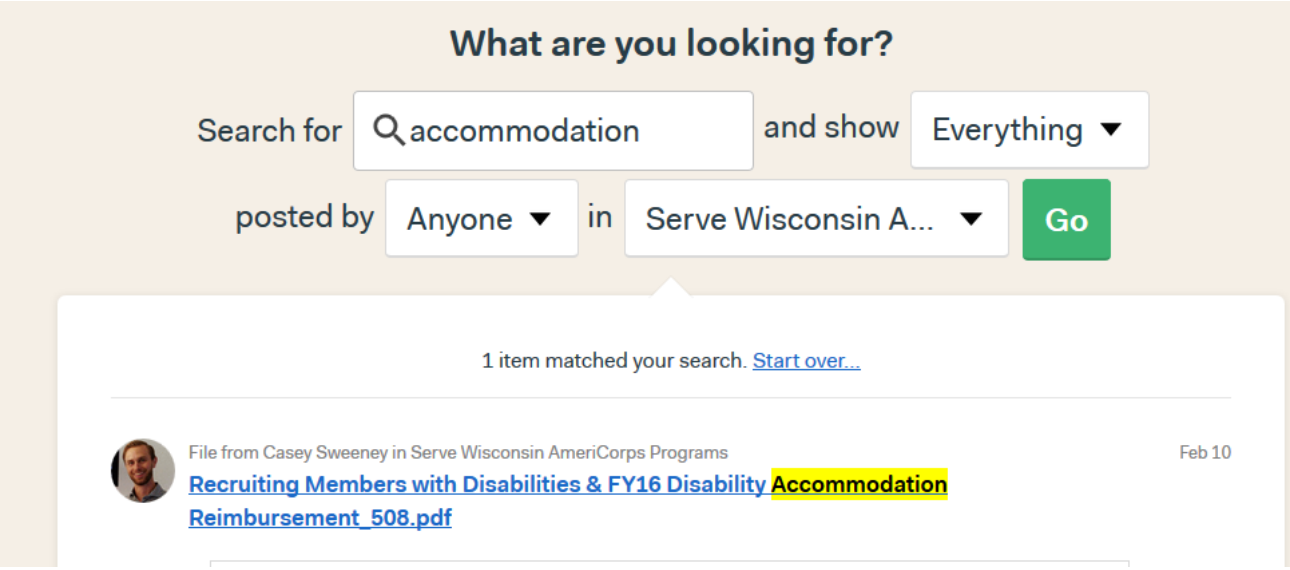
9.1. Using Basecamp to Access Program Resources

As of writing, there are over 380 resources stored on Basecamp intended to support AmeriCorps programs work. That's a lot. There are a couple of ways we hope that you use Basecamp to quickly find the resources you are after – whether you know you are after them or not.

First, try searching for resources based on keywords. For example, say you are looking to find resources on how to appropriately accommodate an AmeriCorps member who has disclosed a disability. Start by clicking the 

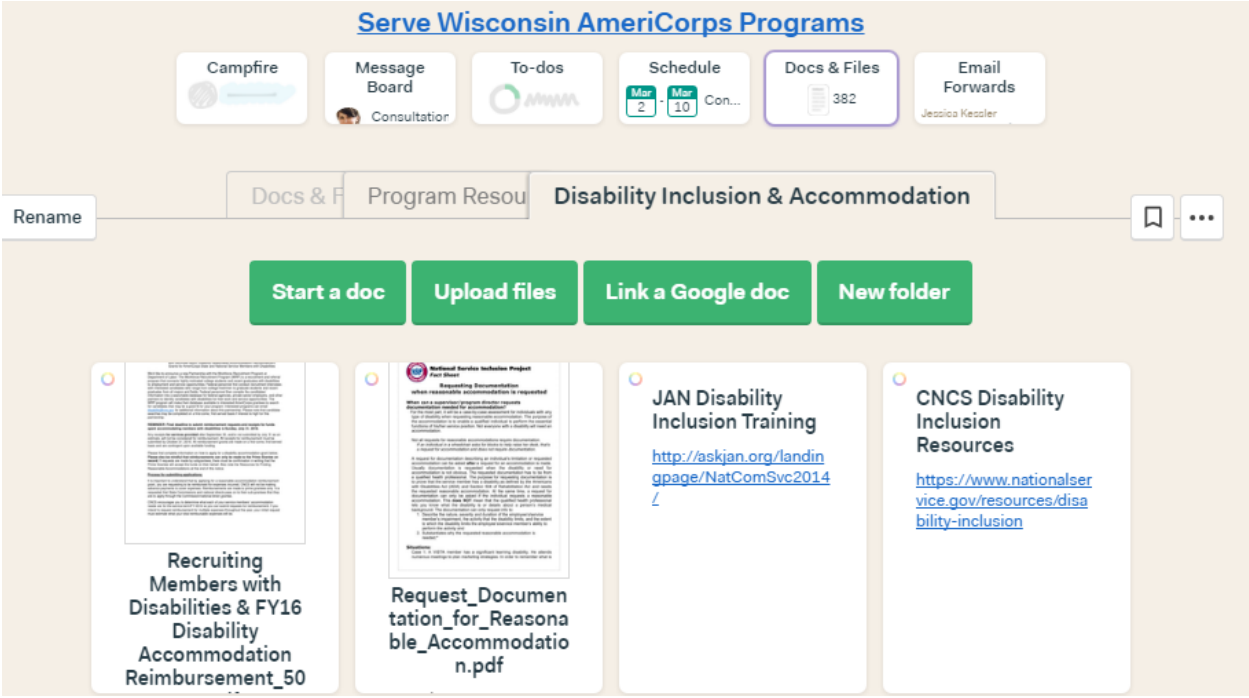
button on the top of the page.

Since you're looking for resources on how to accommodate members, accommodation would be an appropriate keyword to use to search. You enter the keyword, click *Go*, and find one result.



Since the only result is dealing with accommodation reimbursement, it isn't quite relevant to you. So, you turn to the second method of finding resources on Basecamp: good old fashioned browsing. Trust us, it really isn't as hard as it sounds.

You start by entering into the Docs & Files section of Basecamp.

Once there, enter into the Program Resources folder. Once you do, you will see many folders come up. Now, since we are looking for accommodation resources, search for any folders that would be relevant to that topic. In that search you happen to find the Disability Inclusion & Accommodation folder. You may be asking why this folder didn't show up in the search. That is because the search feature only searches document and file titles, not for words within the documents or folder titles.

Now in the Disability Inclusion & Accommodation folder you see four documents, shown below. One of them showed up in the orginal search, the other three are new. By looking through the remaining three, you find relevant information relating to your search to find more information about accommodating members. Hooray!