



Nevada Volunteers

AMERICORPS PROGRAM MANAGEMENT GUIDELINES

2009

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I. INTRODUCTION TO PROGRAM MANAGEMENT

A. Overview

The purpose of these policies and procedures is to provide Nevada Volunteers' staff with the basic operational framework to effectively select, monitor and support Nevada's AmeriCorps programs. The federal legal and regulatory requirements that fortify AmeriCorps national service are extensive and serve as the basic foundation by which state commissions and AmeriCorps programs must operate. Nevada Volunteers is Nevada's state national service commission. As such, it is Nevada Volunteers' responsibility to clearly communicate AmeriCorps program requirements and expectations to all subgrantees. These policies and procedures outline the policies, procedures and technical assistance opportunities used to support quality and effective AmeriCorps programs. Although this document is primarily geared toward Nevada Volunteers' staff, local AmeriCorps program staff will find these procedures to be a valuable resource for understanding the basic expectations and requirements for operating an AmeriCorps program in Nevada.

B. Guideline Sections

These guidelines consist of five primary areas:

- (1) Program Management
- (2) Grant Application Review, Selection and Appeal Process
- (3) Program Monitoring
- (4) Training and Technical Assistance
- (5) Grant Close-Out Procedures

Each of these areas is interdependent and collectively serves as the basis for effective AmeriCorps program management at the state commission level.

Program Management – Nevada Volunteers is a state commission with legal authority to manage AmeriCorps programs. The Corporation is the AmeriCorps grantor. Nevada Volunteers is the AmeriCorps grantee. AmeriCorps State programs are the AmeriCorps subgrantees. The nature of the relationship between the Corporation, Nevada Volunteers and AmeriCorps State subgrantees is defined herein.

Grant Application Review and Selection - A sound grant review and selection process is the first mechanism Nevada Volunteers uses to ensure future program success. This section outlines the policies and procedures that make up Nevada Volunteers' grant review and selection process for Competitive, Formula and Ed Award applications including planning grants, project development, committee review, past performance review, program selection, negotiations, notice of awards and appeal process.

Program Monitoring - As a pass-through entity, Nevada Volunteers has a legal responsibility to monitor Nevada's AmeriCorps programs. Effective monitoring is essential for continued program development and maturity. This section will outline the policies and procedures that comprise Nevada's monitoring protocols including program and financial reporting, site visits and remedial action.

Training and Technical Assistance - Nevada Volunteers receives Program Development Assistance and Training (PDAT) funds from the Corporation to develop and maintain an infrastructure to enhance and sustain high quality national service programs. Training and technical assistance opportunities available to AmeriCorps programs funded by Nevada Volunteers are outlined herein.

Grant Close-Out Procedures

The Corporation for National & Community Service requires complete grant close-outs for all grants that have operated for a three year period. Grant close-out procedures are described in this manual.

II. GRANT APPLICATION REVIEW, SELECTION & APPEAL PROCESS

OVERVIEW

Nevada Volunteers recruits, reviews and selects quality program applicants that reflect the needs and priorities of the state as determined by the Commission and its constituents. In establishing state priorities, the Commission consults with its national service partners including the Corporation for National Service State Office and the State Office of Education. The Commission's decision to seek new applicants is based primarily on the availability of funds from the Corporation for National & Community Service and the capacity of the State Commission to effectively monitor and support new AmeriCorps subgrantees. There are three primary pools of funds available to potential AmeriCorps program applicants: Competitive, Formula and Ed Award.

Competitive Funds - Competitive funds are awarded to AmeriCorps applicants who successfully compete at both the state and national levels. The Commission formally recommends to the Corporation for National & Community Service all competitive program proposals. The Corporation makes the final decision. Congress determines the availability of funds and the Corporation establishes priorities annually.

Formula Funds – Formula funds are awarded to AmeriCorps applicants who successfully compete solely at the state level. The Commission formally approves programs for formula funding and informs the Corporation of its decisions. Fund availability is determined by Congress and allocated to the Commission on a formula basis – currently \$682,664 per year.

Ed Award Funds – Ed Award funds are awarded to AmeriCorps applicants that successfully compete at the state level. The Commission formally recommends successful proposals to the Corporation. The Corporation makes all final decisions. Congress determines the availability of funds. Nevada Volunteers establishes funding priorities. Ed award funds are available based on the capacity of the Commission.

The Competitive, Formula and Ed Award grant cycles may be held at different times of the year to allow Nevada Volunteers some flexibility in programming formula funds. Other program initiatives may be added to this process as warranted.

GRANT REVIEW PROCESS

Nevada Volunteers utilizes a standard grant review process designed to ensure that only the highest quality proposals in compliance with national service rules, provisions and guidelines are presented to the review team for recommendations. The standard grant review process consists of the following components:

- Announcement of Notice of Funding Opportunity (NOFO)
- Posting of AmeriCorps grant application instructions on our website
- Formal request for AmeriCorps grant applications with due date
- Statewide technical assistance videoconferences
- Receipt of grant applications
- Initial staff review for compliance with application instructions
- Staff program and financial reviews of grant applications
- Commission Program Committee review and scoring of grant applications
- Grant development/negotiation with applicants
- Program Committee recommendations to Commissioners
- Commissioners approval of annual AmeriCorps program portfolio
- Pre-award risk assessments

Some components of the grant review process may be omitted if Nevada Volunteers does not seek new applicants for an upcoming program year.

A. GRANT REVIEW SCHEDULE

Nevada Volunteers develops a grant review schedule prior to the start of the program year that outlines anticipated grant review activities for the year (sample below). The grant review schedule includes submission deadlines for all applicant activities and proposed time frames for staff and Program Committee functions.

DATE	TASK
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August -September	Prepare NOFO and grant application materials
September	Applications available for distribution on website
	Prepare NOFO flyer
	Print flyer and mail
	Run online announcements
	Email NOFO announcement
	Orient Program Committee
October	Technical Assistance Conferences
November	All Applications Due
November	Program Committee Reviews and Scores Applications
January	Submit Competitive Prime Application to CNCNS
February	Conduct Site Reviews
March	Conduct Site Reviews
April	Conduct Site Reviews
July	Submit Formula Prime Application to CNCS
September	New Grant Year Begins

B. NOTICE OF FUNDING OPPORTUNITY (NOFO) and REQUEST FOR PROPOSALS (RFP)

When funds are available and as capacity allows, Nevada Volunteers formally notifies the public of AmeriCorps fund availability in the Fall of each year. This is accomplished through mail, press, and electronic media announcements. The NOFO highlights the dates for AmeriCorps application deadlines, dates of technical assistance videoconferences and introduces the grant application process to interested potential applicants.

C. TRAINING/TECHNICAL ASSISTANCE VIDEOCONFERENCES

Nevada Volunteers conducts two mandatory T/TA workshops via videoconference for northern Nevada, southern Nevada and rural Nevada for all new and continuing program applicants following the NOFO announcement. The primary purpose of the T/TAQ videoconferences is to provide potential applicants with basic information regarding the AmeriCorps*State program including programmatic requirements and grant review criteria. This information is also posted on Nevada Volunteers' web site. An instructional PowerPoint presentation is available for all videoconference participants.

D. INTAKE ASSESSMENT

Staff may conduct an initial intake assessment for all new and continuation proposals that primarily checks the application for submission accuracy and basic compliance issues. Proposals may be disqualified if required portions of the application are missing or incomplete. Staff may also negotiate the proposal with applicants or request immediate revisions to bring applications into compliance before further review and/or scoring is initiated.

E. APPLICATION REVIEWS

Nevada Volunteers utilizes a peer review process to evaluate new AmeriCorps proposals for both the competitive and formula grant cycles. Peer review groups are normally comprised of 4 – 6

grant readers who evaluate and score each new proposal. Participants who serve on peer review committees are required to sign a "Conflict of Interest" form to ensure unbiased evaluation of all proposals. Once all proposals have been read and scored, the Program Committee convenes to discuss results, score and rank proposals, and formalize recommendations to staff and Commissioners. Members of the Program Committee compare scores, approve the proposals, deny the proposals or negotiate planning grants for those new proposals that have great potential but need time to fine tune the proposals and re-apply for the next grant cycle.

F. STAFF REVIEWS

Staff conducts a review of all new and continuation AmeriCorps proposals. For new proposals, staff analyzes the results of the peer review and further scrutinizes the strengths and weaknesses of all proposals. For continuation proposals, staff conducts formal reviews of both past performance and future plans using standardized scoring sheets. Following staff reviews, formal funding recommendations are presented to Commissioners for consideration.

G. COMMISSION RECOMMENDATIONS

Commissioners approve peer review team recommendations and staff recommendations for all new and continuation proposals during a quarterly Commission meeting. At this time, Commissioners may request additional information from staff and/or applicants. Although Commissioners may recommend a proposal for funding, areas may be identified that must be addressed by the applicant prior to awarding a grant. Commissioners conclude the meeting with formal grant recommendations and/or approval.

Based on Commissioner decisions, staff prepare written grant recommendations and compile the aggregate grant application for submission to the Corporation for National and Community Service. Corporation submission deadlines are usually January for competitive proposals and July for formula proposals.

H. NEGOTIATIONS

For competitive applicants, upon receipt of the Grant Award Review Process (GARP) reports from the Corporation, staff confers with the Program Officer at the Corporation to discuss the results of GARP and clarify any issues, concerns, or non-compliance elements identified in the report. Staff, in turn, conducts negotiations with successful applicants. In some cases, applicants may be required to respond in writing to any issues or concerns identified at either the state or national levels. Performance measures may be modified and targets adjusted. Budgets may be changed. Negotiations continue until Nevada Volunteers and the Corporation determines that all non-compliance issues and/or other programmatic or budget concerns have been successfully resolved.

Nevada Volunteers, via the Program Committee, retains the right to select and recommend a compendium of programs, both competitive and formula, that best reflect the diversity in program type and geographic representation befitting the State Service Plan.

I. PRE-AWARD RISK ASSESSMENTS

Staff conducts a pre-award risk assessment regarding financial and organizational capacity to effectively administer federal funding with each new AmeriCorps applicant. Staff also requires a copy of the applicant's most recent audit (or audited financial statements) and strategic plan (if available), as part of the pre-award risk assessment. The information contained in the assessment is intended to help staff understand an applicant's agency/organization and evaluate its overall operational capacity and financial controls. Staff reviews all assessments prior to making a grant award.

J. CONTRACT DEVELOPMENT

Subgrants are delivered as soon as possible after the Commission receives the award letter from the Corporation for National & Community Service. Funds are available when the subgrant is executed and transfers are made to Nevada Volunteers' account with the federal Department of Health and Human Services. Programs may not start prior to the actual start date of the approved grant period. If pre-award costs are requested, they must be submitted prior to the start date. Funds are normally disbursed on a monthly or quarterly reimbursement basis.

K. APPEAL PROCESS FOR GRANT APPLICATIONS

Nevada Volunteers offers an appeal process for AmeriCorps grant applicants whose request for funding has been denied. This process offers dissatisfied grant applicants an avenue to appeal an award decision and assures that the Program Committee's review process and subsequent grant award decisions are accurate, fair and reasonable. Such a process supports applicants' confidence in Nevada Volunteers' policies and procedures for soliciting and awarding AmeriCorps grants.

The Commission endeavors to assure that all grant awards fully reflect sound judgment and compliance with all NOFO terms and conditions and all appropriate AmeriCorps federal, state and state commission regulations. The Commission considers an award appeal for substantive issues of fact concerning bias, discrimination or conflict of interest and/or non-compliance with procedures described in the NOFO document. If the grant applicant has substantive objections to the results of the peer review process, the applicant may request reconsideration.

A request for reconsideration must be made by the applicant in writing within 14 business days after formal notice that an application was denied. A letter of appeal is submitted to the Chief Executive Officer of Nevada Volunteers. The letter must:

1. Describe the factor(s) or fact(s) concerning bias, discrimination, conflict of interest or non-compliance that cause the applicant to conclude that the application should have been approved;
2. Outline the specific area(s) in the proposal that applicant believes significantly addresses the NOFO requirements;
3. Identify specific information in the application that the applicant believes Nevada Volunteers overlooked or misinterpreted.

Nevada Volunteers' Chief Executive Officer and/or other designated staff person(s) will review the appeal request within 5 business days of its receipt to ensure that it is in compliance with this policy and merits further review. If the CEO or his/her designee(s) determines the appeal letter

substantiates that there are material issues concerning bias, discrimination, conflict of interest or non-compliance with procedures set for in the NOFO, a Commissioner panel consisting of the Commission's Program Committee, Chief Executive Officer and the Commission Chair will re-review the application.

Nevada Volunteers will respond in writing with the final decision on any outcomes of the appeal review within 14 business days after the decision is made by the Commissioner panel. The Corporation for National and Community Service always has final approval rights for all Nevada Volunteers' grant awards.

III. PROGRAM PROGRESS REPORTING

A. OVERVIEW

Nevada Volunteers uses a variety of reporting methods to report and monitor programmatic developments including quarterly progress reports, the annual Grantee Progress Report, National Service Trust forms and annual program site visits. Copies of all reports and forms are kept on file at the Commission and the Corporation.

B. PROGRESS REPORTS

AmeriCorps programs are required to submit four (4) progress reports to Nevada Volunteers. Progress reports monitor a program's progress toward meeting annual performance measure targets, assess program strengths and challenges, highlight unique program achievements and identify opportunities for further training and/or technical assistance. Progress reports are due quarterly on the 15th of each January, April, July and October. They are reviewed by staff and forwarded to the Corporation as part of an annual aggregate report.

Nevada Volunteers expects all progress reports are thoughtfully constructed in such a way as to provide an accurate reflection of the program's accomplishments and challenges for the reporting period. At a minimum, programs must ensure that:

- All questions are accurately answered
- Program impact is clearly stated in the summary sections
- Challenges are honestly outlined
- Measures to address challenges, improve the program, and/or comply with federal rules and provisions are clearly identified
- Include annual program summaries assessing impact with final, fourth quarter report

Nevada Volunteers provides AmeriCorps programs with a progress report template with complete instructions. Progress reports are submitted as an email attachment to the Director of Programs by 5:00pm of the due date (generally 15 days after the end of each quarter).

❖ Progress Report Review Procedures

1. Staff monitors progress reports each quarter.
2. Staff reviews progress reports within 30 days of submission.
3. Staff provides written feedback to each program within 30 days of submission.
4. Staff monitors remedial action as necessary.
5. Staff compiles an annual aggregate progress report to the CNCS Program Officer via eGrants by the established deadline (generally the first week of each December for the previous program year).

C. FINAL PROGRESS REPORT

The Grantee Progress Report is completed at the end of the program year and provides a concise picture of direct service accomplishments. All programs are required to submit their final, fourth quarter progress reports by October 15th.

❖ Final Progress Report Review Procedures

1. Staff confirms receipt of program Final Progress Report by October 15th.
2. Staff creates Grantee Progress Report for each grant type (competitive and formula) and submits via eGrants by the established deadline (generally first week of each December).

D. NATIONAL SERVICE TRUST FORMS

The required National Service Trust forms include the member enrollment, exit and change of status forms. All forms must be completed and submitted according to the timeframes identified in the subgrantee agreement and the AmeriCorps Provisions. In general, enrollment forms should be processed within 30 days of a member's enrollment, exit forms should be processed within 15 days of a member's exit, and change of status forms must be submitted immediately following a member's change in status.

Nevada Volunteers and the Corporation will use enrollment and end-of-term forms to compile demographic and descriptive data regarding the AmeriCorps member experience. All reports that are generated by the use of member data will be forwarded to the respective programs upon completion.

❖ National Service Trust Forms Review Procedures

1. Staff monitors processing of all required Trust forms during site visits.
2. Staff monitors remedial action as necessary.

E. PROGRAM SITE VISITS

Nevada Volunteers conducts annual AmeriCorps program site visits to review member files, performance and to assess member satisfaction.

IV. PROGRAM FINANCIAL REPORTING

A. OVERVIEW

Nevada Volunteers uses several methods to monitor financial compliance including (1) Nevada Expense Report Forms (NERFs), (2) Federal Financial Reports (FFRs) (3) Reimbursement Requests, (4) Budget Modification Requests, (5) Audit Reports, and (6) Financial Monitoring Site Visits and/or Desk Audits. Collectively, these methods provide staff with the tools to assess and monitor the overall financial management of grant funds.

B. FINANCIAL STATUS REPORTS AND PROGRAM EXPENDITURE SUMMARIES

All AmeriCorps programs are required to submit two Financial Reports: Federal Financial Report (FFR), and the Nevada Expense Report Form (NERF. Both the Commission and the Corporation use each of these reports to monitor grant expenditures and matching fund requirements. FFRs are reviewed by Commission staff or consultants.. FFRs are forwarded to the Corporation as part of an aggregate financial report.

The NERF is reviewed using a NERF Review form. Particular attention is paid to calculating match requirements and comparison of year-to-date totals to budgets. Copies of all FFR's and NERFs are kept on file at Nevada Volunteers. Once approved, neither an FSR nor a NERF can be changed without prior, written consent of Nevada Volunteers.

Programs must provide back-up documentation required for NERFs, to reflect a cumulative spreadsheet and reports from the organizations books of financial records. Further documentation may be requested for an FFRs as deemed appropriate by staff.

FFRs are due by the 15th of each month following the end of the second and fourth quarters.

❖ FFR and NERF Review Procedures

1. Staff receives FFRs and NERF and confirms receipt of financial reports with programs.
2. Staff reviews FFRs and NERFs using the FSR/NERF Review Form and requests clarification and/or revisions where appropriate by the established deadline.
3. Staff provides written feedback concerning any clarification/revisions needed.
4. Staff monitors remedial action.

C. PROGRAM PAYMENTS

Nevada Volunteers reimburses programs for approved and budgeted expenditures that have already been incurred. Programs are required to submit payment requests to the Commission on at least a quarterly basis but no more than monthly. In some cases, Nevada Volunteers may approve up to one month of advance for start-up funds. Under no circumstances will Nevada Volunteers advance funds or reimburse programs for unauthorized or unallowable expenses.

Programs must submit all payment requests with a NERF. Documentation to back-up the NERF must be faxed or emailed. Program must also send Invoice/Payment Request via email requesting payment. An original with signature must also be mailed. Typically, programs can expect to receive payments within two weeks of the regularly scheduled accounts payable run days of the 5th or 20th of each month. All programs must pay special attention to this timetable to avoid potential cash flow problems. NERFs are due 3 days ahead of the account payable runs: i.e.: the 3rd and the 17th. Programs anticipating cash flow problems should contact Nevada Volunteers as soon as possible.

D. BUDGET MODIFICATIONS

During the course of a budget year, programs may find it necessary to make changes to individual budget line items. Budget revisions require prior Commission approval. For any changes, a full explanation must be provided including the reason for the change and what the adverse consequences would be if the request were denied.

Programs must obtain the prior written approval of Nevada Volunteers and the Corporation before making the following budget modifications:

1. Specific Costs Requiring Prior Approval before Incurrence under OMB Circulars A-21 (2 CFR part 220), A-87 (2 CFR part 225) or A-122 (2 CFR part 230). For certain cost items, the cost circulars 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.
2. Entering into sub-grants or contracting out any program activities funded by the grant that have not been specifically identified in the approved application and grant.
3. Transferring funds among cost categories, which cause any single category to increase or decrease more than 10 percent. Administrative cost limits must not be exceeded.
4. Purchasing of equipment over \$1000 using grant funds, unless specified in the approved application and budget.
5. Change in or absence of program director or other key agency personnel.

Programs should not assume approval has been granted for any budget modification unless written documentation has been received from Nevada Volunteers.

❖ Budget Modification Procedures

1. Staff receives Budget Modification Request from program, reviews justification, seeks additional information from program if necessary, checks budget for accuracy, and makes initial approval/disapproval determination.
2. Staff determines whether or not additional approval from CNCS is required. If CNCS approval is required, staff drafts CNCS approval request and sends request to CNCS grants officer for review of budget modifications or CNCS program officer for review of slot conversions.
3. If request is approved by the Commission or CNCS, staff drafts appropriate documentation, sends documentation to program, places approval documentation in program's grant file, and notifies CNCS grant and/or program officer of changes if prior CNCS approval was not necessary. Adjustments in either or both WBRs/e-grants may also be necessary. Subgrantee will be advised if said changes to

electronic systems are required.

4. If request is disapproved by the Commission or CNCS, staff notifies program, communicates disapproval of request, and seeks clarification and/or revisions if appropriate. Staff places disapproved Budget Modification Request in grant file.

E. SLOT CONVERSIONS

During the course of a program year, programs may find it necessary to convert awarded or refill vacant AmeriCorps positions from full to part-time positions or vice versa. Nevada Volunteers also requires all programs to convert vacant slots after 90 days from the start of the grant. All slot conversions require prior approval. With any changes, a full explanation must be provided including reasons for the changes and what the adverse consequences would be if the request were denied.

1. Staff receives slot conversion request via email from the program, reviews the justification, seeks additional information from program if necessary, checks budget for accuracy, and makes initial approval/disapproval determination.
2. Staff review slot conversions requests and convert slots as necessary.

F. AUDITS

Programs may be audited and/or reviewed by Nevada Volunteers' staff and/or an independent agency to determine whether financial operations are properly conducted, financial reports are fairly represented, and the program is complying with all applicable laws, regulations and administrative requirements that affect the expenditure of program funds. Commission financial auditing will be conducted according to the site visit procedures outlined in this manual. If applicable, independent auditing will be conducted according to the Single Audit Act and OMB Circular A-133.

OMB Circular A-133 applies to all grantees of federal funds who expend \$500,000 or more in a year of federal awards. Essentially, all A-133 audits shall be performed annually.

Qualifying AmeriCorps programs must submit their A-133 audit reports to the Commission within nine (9) months of the end of the program fiscal year.

Audit Report Procedures

1. Staff receives program audit report, management letter and supporting documents by due date.
2. Staff reviews audit report for any identified weaknesses or findings according to A-133 Review Form.
 - If audit report does not identify weaknesses or findings, staff places one copy in the program's grant file.
 - If audit report identifies weaknesses or findings, staff sends letter to organization's executive director requesting a written plan for remedial action. Letter also requests follow-up documentation when remedial action is completed. Staff places one copy of letter and report in program's grant file.
3. Staff documents receipt of written plan for remedial action and places copy in grant file.

4. Staff monitors written plan for appropriate remedial action.

V. RISK BASED PROGRAM MANAGEMENT & MONITORING

- I. OVERVIEW OF RISK-BASED MONITORING STRATEGIES
- II. NEVADA VOLUNTEERS' OVERSIGHT STAFF
- III. PRE-AWARD MONITORING
- IV. ONGOING MONITORING
 - a. eGrants reviews
 - b. Program quarterly progress reports
 - c. Program correspondence
 - c. Site visits
- V. COMPLIANCE STATUS and IMPACT ON PROGRAMS
- VI. RESOURCES FOR PROGRAMS

I. OVERVIEW

Nevada Volunteers monitors subgrantees to ensure compliance with all applicable federal, state, and Commission policies and procedures. Monitoring also seeks to evaluate the quality of service activities and the AmeriCorps members' experience.

Nevada Volunteers' staff is committed to communicating clear expectations to programs, providing timely guidance that focuses on both compliance and quality issues and helping programs continuously improve their operations and impact.

A "risk-based" monitoring approach helps staff monitor programs in an efficient, consistent, transparent and strategic way.

Risk Based Monitoring

Nevada Volunteers uses a variety of methods to monitor its AmeriCorps programs. A risk-based approach determines the appropriate strategy for, and level of, program monitoring that is needed for each program. In evaluating a program's risk level, the following factors are considered:

- Previous experience as a subgrantee
- Previous experience in managing federal or state grants
- Previous monitoring/compliance issues and how they were resolved
- Size and/or scope of the grant
- History of meeting performance measures
- Previous independent audit findings
- Program staff tenure/turnover
- Agency infrastructure and support
- Prior program and financial site visit reports
- Adequacy and timeliness of program and financial reports
- Level of responsiveness to Nevada Volunteers' staff
- Program Member enrollment and retention rates
- Participation in teleconferences, meetings and training events

A program’s risk assessment – conducted jointly by Nevada Volunteers’ Program and Financial Monitoring Consultant – is completed just prior to the start of the grant year (as a component of the “Pre-Award” monitoring procedures). The numerical assessment of the above risk factors will categorize programs into one of three risk levels: High Risk, Medium Risk or Low Risk. The table below serves as a basic guide for Program Monitoring based on risk:

NEVADA VOLUNTEERS RISK-BASED PROGRAM MONITORING

	LOW	MEDIUM	HIGH
Progress Reports	Quarterly	Quarterly	Quarterly
Federal Financial Reports	Quarterly	Quarterly	Quarterly
Pre-Award Document Review (Including independent audit)	X	X	X
Pre-Award Risk Assessment	X	X	X
Site Visit: Fiscal Director Interview	As needed	X	X
Site Visit: Fiscal File Sampling	1	2	3
Site Visit: Program Director Interview	X	X	X
Site Visit: Member File Sampling	50%	75%	100%
Site Visit: Member Interviews or Focus Group	25%	50%	100%
Site Visit: Host Site Interviews	As needed	25%	50%
Site Visit: Program Follow Up Visit	As needed	As needed	X
Desk Audit: Programmatic Sample	As needed	X	X
Desk Audit: Fiscal Review	As needed	X	X
Desk Audit: Fiscal File Sampling	As needed	X	X
Pre-Award Program and Financial Orientations	X	X	X
Individualized Technical Assistance Sessions	As needed	As needed	As needed

Note: Nevada Volunteers may alter a program’s monitoring strategy if a staff member with oversight responsibility deems additional oversight to be necessary. For example, if a low risk program hires a new program director, the program officer may decide to conduct a site review in addition to a programmatic desk review.

II. NEVADA VOLUNTEERS OVERSIGHT STAFF

Each program is assigned a Program Officer, who serves as the primary liaison between the Nevada Volunteers and the respective programs:

Nevada Volunteers' Program Officer is our Director of Programs, Bryan Guiot at our Henderson Office. 702.808.4020. bryan@nevadavolunteers.org

The Program Officer is responsible for programmatic oversight and ensuring adherence to AmeriCorps Rules, Provisions, federal regulations, state laws, and Commission policies and expectations. To this end, program officers monitor member service documentation, progress towards the grant's performance outcomes and appropriate use of AmeriCorps funds. Program Officers also provide technical assistance and mentoring to program staff, and work with programs towards continuous quality improvement and program excellence.

The AmeriCorps Program Director is expected to contact his/her Program Officer with program questions and concerns. On-going communication includes regular contact by phone, e-mail, in person and by standard mail. Copies of correspondence are maintained in the subgrantee's Program' File ("Nevada Volunteers File") for each program year.

Subgrantee financial staff communicate with Nevada Volunteers' Financial Monitoring Consultant, who serves as the primary liaison between subgrantees and Nevada Volunteers:

Nevada Volunteers' Financial Monitoring Consultant is Michael Kenefick. 301.503.7700. mlkenefick@comcast.net

The Consultant similarly provides fiscal oversight to ensure proper stewardship of federal funds, as outlined by federal rules, provisions, administrative regulations, state law, and Nevada Volunteers policies. The Consultant also provides technical assistance to program fiscal directors, conducts fiscal site visits and desk audits, monitors program expenditures and match claims through Financial Status Reports (FSRs) and reimbursement requests (PERs), prepares program reimbursements, and facilitates grant closeouts. In general, the Consultant should be the primary Commission contact for fiscal management issues.

III. PRE-AWARD MONITORING

Prior to the Grant Review process, Nevada Volunteers takes the following steps to assess applicants' capacity to manage federal funding:

A Pre-Award Risk Assessment is completed for all new applicants. The survey measures the degree of financial risk that could be incurred by Nevada Volunteers if the agency is funded. Additionally, the Program Officer will complete an "Organizational Risk Assessment" to gauge risk as outlined in Part I.

Applicants submitting applications to continue their programs can be similarly assessed using a standard "risk assessment" that takes into account the performance of the program to date. Recurring issues and problems with compliance are included in this report, which is prepared by the Program Officer and delivered to the Commission's Program Committee. These assessments are factored into the scoring process during both the Program Committee grant application reviews.

After funding recommendations have been made to CNCS, the Program Officer

takes the following actions to ensure that programs are adequately prepared for the grant year:

1. Document Review: The Program Officer analyzes all documents that are vital for successful program administration. Feedback is sent to the Program Director; changes may be required prior to the grant period start date. The document review focuses on proactive member and site monitoring systems, and quantitative data collection systems. These may include, but are not limited to:

- Member Contract – with an emphasis on the integration of AmeriCorps Rules, Provisions and Guidelines’ programmatic requirements
- Performance measures and data collection tools
- Member Service Logs & program staff timesheets
- Financial documents, such as in-kind contribution tracking logs
- Host site agreements and/or Memoranda of Understanding with host sites
- Member service position descriptions

2. Distribution of current Commission policies: Official AmeriCorps Program Management Guidelines, Nevada AmeriCorps Program Director’ Grant Management Manual updates, the AmeriCorps Rules and the AmeriCorps Provisions are distributed annually (usually during preaward orientation). As policy changes occur, the Program Officer sends updates to all Program Directors via email.

3. Distribution of requirements: Within the Subgrant Agreement and during the annual pre-award orientation, all requirements and expectations for AmeriCorps programs are clearly defined. Fiscal and programmatic reporting deadlines, site visit requirements and closeout procedures, etc. are communicated to programs before the start of the grant year. Each program receives a copy of Nevada’s AmeriCorps Program Directors’ Grant Management Manual that is updated annually. Program directors also have free access to www.nationalserviceresources.org.

4. Pre-award orientation and training: Program directors and fiscal directors are required to attend an annual training prior to the start of the grant year that provides technical assistance focused on start up issues and AmeriCorps grant management requirements. All program directors and fiscal directors receive copies of the AmeriCorps Program Review Instrument at this time.

5. Pre-award teleconference: Teleconference can be scheduled prior to, or coinciding with, the program start date. Calls can focus on clarification of start-up issues, resolving any outstanding fiscal and/or programmatic issues from previous grant periods and assessing the degree of technical assistance that a program may require during the coming year. The Program Officer is readily available by phone or email to answer questions, offer solutions and support the Program Director as needed.

IV. ONGOING MONITORING

a. eGrants Reviews

eGrants is the central, internet-based reporting system for AmeriCorps member and financial management. Oversight staff monitor programs on a continuous basis to determine member

recruitment and retention, service activity and outcomes, and adherence to both fiscal and programmatic commitments.

The NCNCS Program Officer will monitor the following:

Report deadlines: All programs are required to enter quarterly progress reports (coinciding with calendar quarters) by deadlines specified in the Subgrant Agreement.

Member Information: Member information (commitments, enrollments, change of status, and exits) is required to be entered into eGrants within 30 days of the event.

Member Hours: All member service and training hours (service logs) should be up-to-date for the period of any corresponding PER/Invoice that is submitted. Member hours should be entered into an appropriate spreadsheet at least once per month for internal review and control.

The Financial Monitoring Consultant will monitor:

Fiscal Reports: Programs may also be sent feedback about their PER (Periodic Expense Report) or Income Reports (See PER Processing Procedure) by the Financial Monitoring Consultant. Generally, program payment may be delayed or withheld if:

- Cash match looks insufficient
- General Ledger does not correspond to PER
- Calculations are incorrect
- Variations from the original budget total more than 10% of the total grant amount
- An expenditure appears non-allowable or unallocated and requires investigation

Program payment is withheld, according to Nevada Volunteers' policy, if a program is considered non-compliant.

b. Program Progress Reports:

Programs receive feedback for each quarterly program progress report submitted. Enrollment and retention rates are monitored. Performance measurement targets are assessed quarterly. Feedback may require a written corrective action plan and timeline by the Program Director.

c. Program Correspondence

Throughout the grant period, the Program Officer documents calls, meetings and correspondence with programs. Important telephone conversations are followed up with emails to outline conversations and other substantive emails and letters are archived. Issues raised in such correspondence may be considered in future funding decisions, and/or addressed in-depth during site visits. If such correspondence evidences areas of risk or non-compliance, the Program Officer may send an official letter of non-compliance outlining deadlines for the program to complete appropriate corrective actions.

c. Site Visits

Oversight Staff make an annual site visit to every program for the purpose of building communication, providing technical assistance and monitoring the program. Formal site visits are scheduled at a mutually agreed upon time. Nevada Volunteers reserves the right to require additional visits as it deems necessary. In this case, the program will be notified in writing why the additional site visits are warranted.

The program agrees that Nevada Volunteers has full access at any time and the right to examine, audit, and copy on the program's premises any directly pertinent records and computer files involving transactions relating to the Subgrant Agreement.

At minimum, the following records must be available for review:

- Complete AmeriCorps member files
- Documentation of member eligibility
- Documentation of members' time (service logs)
- Documentation of member PreService Orientation
- Documentation of ongoing member training
- Documentation of all performance measurement data
- Documentation of staff time (time sheets)
- Documentation of all equipment, materials, supplies, and travel expenses
- Documentation of in-kind contributions
- Rationale and documentation of any indirect costs
- Any other records which support charges to project funds

SCHEDULED SITE VISIT PROCEDURES

ON-SITE MONITORING VISITS

On-site visits are the most comprehensive monitoring that Nevada Volunteers conducts. Although site visits are primarily used to assess program compliance status, they also serve as the best way to assess the quality of programming and to address continuous quality improvement issues. Program monitoring site visits are conducted by the Program Officer. Financial Monitoring Site Visits are conducted by the Financial Monitoring Consultant.

The following is a chronological sketch of the initial monitoring visit:

Before the Visit:

- Two to four weeks in advance of the agreed visit date, the Program Officer sends the Program Director and Financial Director (if applicable) a pre-visit letter informing him/her of the monitoring visit process. The pre-visit letter includes a tentative site visit agenda and a copy of the AmeriCorps Program Review Instrument.
- The Program Director ensures that the appropriate program staff and/or members are available and determines the order of visit's components.
- The Program Officer or Financial Director conducts the Pre-Visit Assessment, which is largely a summary of all compliance/risk concerns to date. All communications thus far

with the program are factored into this assessment. Any findings of the Pre-Visit Assessment are incorporated into the site visit agenda.

- The Program Officer gathers any relevant documents for the visit, such as the results of the Pre-Visit Assessment, documents which require revision, any previous feedback reports and program responses, or WBRS member rosters, and member hour tables.

During the Visit:

The site visit will include any of the following components (described below), based on the program's risk assessment:

- Program Director Interview
- Member File Reviews
- Member Focus Group or individual member interviews
- Site Supervisor Interviews
- Fiscal Director Interview
- Fiscal File Sampling

□ **Program Director's Interview:** Conducted by the Program Officer, this interview serves as a follow up of any outstanding issues or compliance problems. This interview is also a comprehensive check to ascertain compliance with AmeriCorps Provisions and conditions of the Subgrant Agreement.

□ **Member File Sampling:** Member files for the program are reviewed to ensure compliance with required documentation. Member files are reviewed later in the year to ensure compliance with mid-term evaluations. Member files from the previous year can be reviewed to ensure compliance with end-of-term evaluations and exit documentation. Each file that is reviewed is initialed by the Nevada Volunteers' Program Officer.

□ **Member Focus Group:** The Program Officer facilitates a member focus group, with the intent of involving at least three but no more than ten members. No program staff members are present. The questions and responses are recorded on the Member Focus Group form. Member responses are kept confidential unless a member raises an issue that needs the immediate attention of the Program Director (e.g., members are participating in prohibited activities). Program Directors are encouraged to issue an open invitation for participation to members, though some directors of smaller programs may invite the entire team, or particular members. At the Program Officer's discretion, members can also be interviewed individually. Questions include whether members are satisfied with their national service experience, if they receive adequate supervision and if they have any suggestions that might improve the program.

□ **Site Supervisor Interview:** At multi-site programs or those that operate with intermediaries, the Program Officer visits at least one operating site (randomly selected) and interviews the site supervisor and the member, if

applicable. The interviews are documented on standardized interview forms.

□ **Financial Director's Interview:** Conducted by the Financial Monitoring Consultant, this interview assesses the fiscal management of the program by examining:

- o Fiscal policies and procedures
- o a detailed general ledger/expenditure report and Balance Sheet,
- o random sample of member and staff payroll and corresponding time sheets for staff,
- o random sample of source documentation for expenditures and match contribution.

Findings in the subgrantee's audit report will also be discussed during the interview, if appropriate.

□ **Fiscal File Sampling:** Conducted by the Financial Monitoring Consultant, this assessment reviews the program's general ledger/expenditure report. Random samples of up to ten fiscal transactions from the general ledger/expenditure report are examined to ensure that:

- o Grant expenditures correspond directly to a line item in the budget.
- o Transactions adhere to program procurement and cost allocation procedures.
- o Transactions demonstrate segregation of duties within the organization.
- o Receipts or disbursements are clearly attributable to the grant and are allowable costs.
- o Member living allowances claimed for reimbursement are within budgeted allotments and are distributed evenly over the service contract.

After the Visit:

- Within four weeks of the site visit date, staff send a detailed site visit summary letter to the Executive Director and AmeriCorps Program Director and/or Fiscal Director. This feedback includes a list of all compliance issues identified during the visit that require corrective action and risk management issues which may also require attention. The compliance assessment is accompanied by general feedback from Nevada Volunteers staff and a request for a written response and corrective action plan within 30 days.
- The program is expected to respond in writing to the feedback -- generally within four weeks (or 30 days) of receipt of the documents. Written responses typically include the corrective actions the program will take and a time table to reach compliance.
- Once Nevada Volunteers receives the program's written response, the Program Officer will log the date it arrived, and ascertain the new compliance status of the program. Confirmation of the program's compliance status, or a request for further information may be sent in writing (e-mail or via letter).

DESK AUDITS:

Desk audits can be used to follow-up on issues that were discovered in the on-site visit, as the primary oversight tool for very low-risk programs, or to serve as "spot checks" to ensure that proper program documentation is retained at subgrantee sites.

Desk audits can be conducted in conjunction with the quarterly AmeriCorps program progress report review by the Program Officer or with the help of the Financial Management Consultant. These audits are conducted by phone.

Before the Desk Audit:

A week in advance of the desk audit, Oversight Staff send a list of the areas that will require sampling (i.e. Member files or match documentation). Content areas may be randomly chosen or may reflect previous compliance concerns from earlier site reviews or desk audits.

During the Desk Audit:

Staff will request that a list of documents be faxed to the Nevada Volunteers' Office by the business day's close. The desk audit will include any of the following components (described below), based on the program's risk assessment:

1. Programmatic Document Sample
2. Fiscal Systems Review
3. Fiscal File Sampling
4. Performance Measurement Tools

Programmatic Documents that may be sampled include

- o Member eligibility documentation
- o Member service logs
- o Training agenda
- o Proof of Sex Offender Registry Check

Fiscal Systems Review may require samples of:

- o Financial Policies and Procedures Manual
- o Program Staff Segregation of Duties Checklist
- o Employee/Staff Manual
- o Cost Allocation Plan & Approval Letter from largest funding source
- o Blank and completed Staff Time Sheet
- o Copy of the General Ledger/Expenditure Report with account code key
(Last 6 months or from start of program)
- o Match Documentation Procedures/Forms

Fiscal Files that will be sampled may include:

- o Copies of receipts, invoices and/or source documents for expenditures
- o Copies of member and staff payroll and corresponding timesheets
- o Match documentation/forms

Performance Measurement Tools: The Program Officer selects supporting documentation or a random sample of data reported in quarterly progress reports concerning target outputs and outcomes, special community service projects, volunteer recruitment or sustainability initiatives.

V. COMPLIANCE STATUS & IMPACT ON PROGRAMS

Official site visits, informal visits, and ongoing monitoring may reveal areas of noncompliance, areas for improvement, or areas of “risk.” As a result, Nevada Volunteers may determine program status to be: “Non-compliant,” “Compliance Pending,” or “Compliant.”

If a subgrantee demonstrates non-compliance in relation to AmeriCorps Provisions, or does not remedy pending compliance issues or areas of risk* by due dates specified, future funding and/or pending requests may be withheld until all issues are adequately addressed.

*“Areas of risk,” although not issues of non-compliance, must be corrected by the program to fulfill our risk-based monitoring strategy, and to ensure full compliance in future reviews. “Areas of risk” can include, but are not limited to:

- Sub-standard member retention rates (below 80%)
- Lack of responsiveness to Nevada Volunteers’ staff
- Program staff turnover
- Inadequate or late reports
- Fiscal deficiencies
- Inability to demonstrate progress towards grant performance measures
- Severity or chronic nature of deficiencies discussed during the pre-award assessment period, or during site visits
- Issues discussed during email or phone correspondence with the program – including all items relating to program policies

Issues of financial non-compliance generally require corrective action by the program within two weeks. Programmatic deficiencies may have a longer timeframe to be addressed; however, if a deficiency is not addressed by the deadline indicated in the site visit summary letter, the program will be considered non-compliant.

Programs must respond to the site visit summary letter, by the required date specified in the letter, indicating compliance with the issues listed. If the necessary actions have not been taken, Nevada Volunteers may withhold future funding, including any pending requests, until all issues are addressed.

Any non-compliant program is in a position to lose current funding, to have reimbursements delayed, or to have the program terminated. As previously stated, all compliance issues will be considered cumulatively as grants are reviewed in the renewal process.

When serious or chronic program issues arise, Nevada Volunteers’ CEO and/or members of the Commission’s Executive Committee may become involved in the resolution process and determine appropriate repercussions.

VI. RESOURCES FOR PROGRAMS:

To assist programs in efforts to be fully compliant and effective, Nevada Volunteers offers the following training and technical assistance:

Pre-Award Orientation and Training: All program directors and fiscal directors attend a pre-award training that ensures that programs fully understand effective AmeriCorps grant management practices, compliance with AmeriCorps Rules and Provisions, member file requirements and start-up issues prior to actually enrolling new members.

Program Director Teleconferences: AmeriCorps Program Directors participate in periodic teleconferences hosted by the Program Officer to foster communication and peer exchanges or mentorships for program staff as needed.

Program Director Quarterly Meetings: Nevada Volunteers provides program directors with training related to relevant topics. Training may include volunteer management strategies, disability inclusion best practices, sustainability plans, financial reporting, performance measurement tools, member recruitment, human resources management issues, etc.

Program Development & Training (PDAT)

The Program Officer facilitates or arranges training based on various assessments, including formal needs assessments, training evaluations, input from Commission staff, risk assessments, and direct requests from program staff and members. Programs that wish to request special training should do so directly with the Program Officer.

Arranged training may include:

- monitoring site visits,
- scheduled meetings with staff, Commissioners, or field “experts”
- teleconferences and webinars;
- referrals to CNCS contracted TA providers
- peer exchanges with other state or national programs
- facilitating participation in CNCS-sponsored trainings

Because training for members and operating site staff is required by AmeriCorps Provisions, not attending to these trainings may affect a program’s compliance status. The Program Officer is responsible for training oversight, including monitoring program training plans and following up on any compliance or risk issues. .

Areas of risk associated with training might include, but are not limited to:

- Inadequate member PreService Orientation (as outlined by AmeriCorps Provisions)
- Lack of “esprit de corps” among operating sites or host site supervisor complaints
- Substandard staff training
- Compliance concerns that may indicate a lack of training

Sample typical yearly calendar for Nevada Volunteers’ Staff and program activity

DATE	ACTIVITY
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July	Pre-Award Program Orientation and Training
July - August	Preparation of subgrant agreements Program management policies and procedures review
September	AmeriCorps Kick-Off/Swearing In Ceremonies Annual NOFO prepared and announced
September 11	National Day of Remembrance Community Service Project
October 15	Final Progress Reports Due from previous grant year
October 15	FFRs Due from previous grant year
November – December	Competitive Program Site Visits
4 th Sat. of October	Make A Difference Day Community Service Project (optional)
October	TT/A videoconferences for formula and competitive applications
October	AmeriCorps Member Volunteer Management Training
November	Grant application review
December	Annual Grantee Progress Report due to CNCS
January	Program Directors Meeting Competitive Prime Application due to CNCS
January 15	Progress Reports Due
3 rd Monday of January	Martin Luther King, Jr. National Day of Service
February – May	Formula Program Site Visits
April 15 th	Progress Reports Due / FFRs Due
4 th Week April	National Volunteer Week National Day of Service
May	National AmeriCorps Week recognition event
July 15	Formula Prime Application due to CNCS Progress Reports Due

VI. TECHNICAL ASSISTANCE

Nevada Volunteers delivers and administers training and technical assistance activities according to the State Service Plan and/or the PDAT Plan in order to increase the quality of national service programs in Nevada. Major activities include:

- Provide a State Service Plan Training Calendar
- Provide annual pre-award Program Director/Program Financial Staff Training
- Provide quarterly Program Director Meetings/Conference Calls

- Coordinate annual conferences such as National AmeriCorps Week Recognition Event or Volunteer Management training
- Conduct Program Needs Assessments and Training Evaluations

VII. GRANT CLOSE-OUT PROCEDURES

The Corporation requires complete grant close-outs for all grants that have operated for a three year period. Federal regulations require that grants are closed out within ninety (90) days of the end of the grant. Nevada Volunteers notifies the subgrantee of all required close-out documents. In general, those documents include:

Final Financial Status Report: SF 269 A: The final form may not be available on WBRS at the time of your close out. The Final Financial Status Report must be cumulative, covering the entire grant period, and should reflect the required percentage of matching funds that you have agreed to contribute under the terms of the grant.

Equipment Inventory of items purchased with Federal grant funds with a current per unit fair market value of \$5,000 or more, or a written statement that there are no such items.

Inventory of unused or residual supplies purchased with Federal grant funds which in the aggregate exceed \$5,000, or a written statement that such supplies (if any) do not exceed \$5,000.00.

Sub grantee Certification (if applicable).

In addition, if a program has drawn funds under the grant but not expended them, the program will need to return the funds by check made payable to the Department of Health and Human Service, via Nevada Volunteers..

If the agency secured a copyright or patent on any material or device paid for with funds awarded under this grant, the program must provide the Commission with a written confirmation describing the specific nature of the copyright or patent obtained.

Disposition of Equipment

When original or replacement equipment acquired under a sub grant is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, the disposition of the equipment will be made as follows:

- (1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.
- (2) Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
- (3) In the case where a subgrantee fails to take appropriate disposition actions, the awarding agency may direct the subgrantee to take excess and disposition actions.

Final Notice of Close-Out

After Nevada Volunteers forwards the required documents to the Corporation, staff will advise the program, in writing, that the grant award is closed. The closeout of a grant does not affect: (1) the requirement to retain records pursuant to the grant provisions; (2) the requirement and right for audit pursuant to the grant provisions; (3) the right of the Corporation to disallow costs and recover funds on the basis of an A-133, A-128 or other audit or other review; and (4) the obligation of the grantee to return any funds due Nevada Volunteers or the Corporation as a result of later refunds, corrections, cost disallowance or other actions.

VIII. BASIS FOR CONSIDERING COSTS PER MSY ABOVE THE CORPORATION'S ESTABLISHED YEARLY AVERAGE FOR STATES

Policy: It is the policy of Nevada Volunteers to consider applications from individual Nevada AmeriCorps programs that exceed the Corporation's yearly average established for all AmeriCorps programs awarded by Nevada Volunteers.

Procedures: In order to consider cost per MSYs above the average, Nevada Volunteers must first assess its full portfolio of existing programs and the individual cost per MSYs including any programs under the average. This will assist in determining the latitude of Nevada Volunteers to consider programs and number of positions above the average and the degree of costs per MSY above the average. This policy is reviewed annually as Nevada Volunteers prepares its Notice of Funding Opportunity.

After determining its latitude, Nevada Volunteers can then consider applications above the average or exceeding prior cost per MSY based on the following criteria:

For New Applicants: Consideration of any or all of:

- The resources and size of the applicant and if placing members at other sites, the resources of the sites;
- The need to provide adequate funding to assure sustainable development of a new program;
- The resources of the community in which the program proposes to serve;
- The program's location in a rural county per Beale codes or in an economically distressed county considering unemployment rates, per capita income and/or poverty rates;
- Location of applicant in an underserved area of the state as represented by AmeriCorps member serving; or
- Applicant proposing a service priority area for Nevada Volunteers

For Continuing or Renewal Applicants increasing cost per MSY; Consideration of any or all of:

- Significant changes (decrease) in funding of the applicant from fund-raising contributions, foundation support, grants and other sources impacting the applicant's funding of its AmeriCorps share of costs;

- The resources of the community in which it serves and sites where it places members and the impact on sites or applicant's capacity to continue to share in member or program costs at prior levels;
- consideration of increasing unemployment rates and deteriorating economic indicators impacting the state, county or location of program;
- Lack of adequate resources to expand a successful program and its impact to other sites and communities; or
- Grant performance during the last year or years

ALTERNATIVE MATCH

In addition, Nevada Volunteers will consider for programs challenged in meeting increasing match levels starting in their 4th operating year, applying to the Corporation for match waiver and an alternative match schedule requiring a lower level of required match in accordance with the following criteria:

- The program demonstrates that it is either headquartered in a rural county or in a severely economically distressed community as defined in 45 CFR 2521.35-90.
- Also describe the efforts you have taken to raise the resources needed to meet the normal matching requirements

IX. USE OF FEDERAL FUNDS AS AMERICORPS GRANT CASH MATCH (effective October 22, 2009)

It is the policy of Nevada Volunteers to review each request from a subgrant applicant to use federal funds to meet AmeriCorps cash match requirements on a case-by-case basis. The acceptable sources of matching funds are federal, state, local, private sector, and/or other funds in accordance with applicable AmeriCorps requirements. Match can be cash or in-kind contributions.

AmeriCorps applicants are required to discuss their intentions of using federal funds to match an AmeriCorps grant with the other agency prior to submitting an AmeriCorps application to Nevada Volunteers. The discussion must be documented in writing and include the applicants explicit intent to use that federal agency's funding to meet AmeriCorps cash match requirements. The documentation is submitted to Nevada Volunteers as collateral application material. During the application review process, Nevada Volunteers will evaluate each request separately. Appropriate requests may be reviewed with the Corporation for National and Community Service's Office of Grants Management.

AmeriCorps programs may, on occasion, have the opportunity to consider using federal funds as cash match during the course of the AmeriCorps grant award period. Subgrantees are required to discuss their intentions of using their funds to match an AmeriCorps grant with the other agency. That discussion must be documented in writing and include the subgrantees' explicit intent to use that federal agency's funding to meet AmeriCorps cash match requirements. The documentation is submitted to Nevada Volunteers' Program Officer. Nevada Volunteers will consider the request within 10 business days and discuss each request with the Corporation on a case-by-case basis.

The final determination for all such requests for competitively-funded programs are made by the Corporation for National and Community Service. The final determination for all such requests for formula-funded programs are made by Nevada Volunteers, after review and discussion with the Corporation.