

Hawai'i Commission for National and Community Service

AMERICORPS*STATE PROGRAM DIRECTOR HANDBOOK

Updated November 2019

Please notify HCNCS 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.

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Chapter 1 – Introduction

1.1 Purpose of the Handbook and Disclaimer

As an AmeriCorps program funded through the Hawai'i Commission for National and Community Service (HCNCS or "The Commission"), 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 HCNCS 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 <u>Terms and Conditions</u> and then read any relevant information from this manual. Individuals with questions or concerns should consult the <u>National and Community Service Act of 1990</u> ("Act") (42 U.S.C.A. § 12501 et. seq.), the <u>regulations issued under the act (45 CFR § 2500.1 et. seq.)</u>, the <u>Edward M. Kennedy Serve America Act</u>, the most recent <u>AmeriCorps Grant Terms and Conditions</u>, 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.)

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. 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 grantsupported activities, subject to the oversight of HCNCS and the University of Hawai'i in which HCNCS is housed. The grantee must expend grant funds in a judicious and reasonable manner. Although grantees are encouraged to seek the advice and opinion of HCNCS on special problems that may arise, such advice does not diminish the grantee's responsibility for operating decisions.

Information provided in this handbook is no way intended to be the sole source of determining what is allowed or disallowed when administering an AmeriCorps grant. Information included is provided in good faith to be consistent with appropriate rules set forth by CNCS.

Every effort has been made to offer the most current, correct, and clearly expressed information as possible. Nevertheless, inadvertent errors or omissions in information may occur. Grantees are encouraged to contact HCNCS staff with questions or to receive clarification on information herein.

If you notice any broken links, outdated information, inconsistencies, or other errors, please contact HCNCS staff right away so that we are able to make the correction.

1.2 Laws, Regulations and Terms and Conditions

A. Laws

- National and Community Service Act of 1990, as amended
- (42 U.S.C. § 12501, et seq.) Chapter 129 (approx. 95 pages)
- National and Community Service Trust Act of 1993
- Serve America Act of 2009 Please visit www.nationalservice.gov for more information.

B. Regulations

- 45 CFR Parts 2500 2504 Corporation for National and Community Service Chapter XXV.
- Please visit AmeriCorps Regulations.

C. Terms and Conditions | Guidance You can find the current CNCS Terms and Conditions at https://www.nationalservice.gov/resources/financial- management/terms-conditions-and-certifications-assurances-cncs-grants

Chapter 2 – National Service and AmeriCorps Hawai'i

2.1 A Brief History of National Service

When faced with challenges, our nation has always relied on the dedication and action of its citizens. The Corporation for National and Community Service (CNCS) carries on a long tradition of citizen involvement by providing opportunities for Americans of all ages to improve their communities through service.

A. National and Community Service Trust Act

President Bill Clinton sponsored the National and Community Service Trust Act, a revision of the National and Community Service Act of 1990, which was passed by a bipartisan coalition of members of Congress and signed into law on September 21, 1993. The legislation created a new federal agency, the Corporation for National and Community Service (CNCS), to administer federally funded national service programs. The law created AmeriCorps, which was designed to support local, state, and national organizations across the nation, involves Americans in results-driven community service. Individual AmeriCorps participants, known as members, serve for a year, during which they receive a living allowance. After service, members receive an education award, administered by the National Service Trust, and paid as a voucher redeemable for current education costs at colleges, universities, other post-secondary institutions, and approved school-to-work programs, or to pay back qualified student loans already incurred. The legislation drew on the principles of both the Civilian Conservation Corps and the GI Bill, encouraging Americans to serve and rewarding those who do. The new agency also took over management of the programs of two previous agencies, ACTION, which was responsible for running VISTA and the National Senior Service Corps programs, and the more recent Commission on National and Community Service, including the NCCC, forming a new network of national service programs.

B. Service in the New Millennium

In his State of the Union address on January 29, 2002, President George W. Bush called on all Americans to serve their country for the equivalent of two years and announced the creation of the USA Freedom Corps, an umbrella network for volunteerism. A coordinating council housed at the White House and chaired by the President is working to expand and strengthen federal service programs like the Peace Corps, Citizen Corps, AmeriCorps, and Senior Corps, and to raise awareness of and break down barriers to service opportunities within all federal government agencies. Several bills have been introduced in Congress over the past three years to increase funding for national service and to reauthorize the National and Community Service Act.

On April 21, 2009, President Barack Obama signed the **Edward M. Kennedy Serve America Act**. The Serve America Act reauthorizes and expands national service programs administered by the Corporation for National and Community Service, a federal agency created in 1993. The Corporation engages four million Americans in result-driven service each year, including 75,000 AmeriCorps members, 492,000 Senior Corps volunteers, 1.1 million Learn and Serve America students, and 2.2 million additional community volunteers mobilized and managed through the agency's programs. The Serve America Act reauthorizes and expands the mission of the Corporation for National and Community Service, by: increasing opportunities for Americans of all ages to serve, supporting innovation and strengthening the nonprofit sector, strengthening management, cost-effectiveness, and accountability within said entities. To read more, visit President Obama Signs Landmark National Service Legislation.

2.2 National Days of Service

Programs are encouraged to participate in National Days of Service.

| Event | Date(s) | Description |
|--|---|---|
| Martin Luther King, Jr. Day | January 20, 2020 | "A day ONnot a day off". The Corporation for National and Community Service is responsible for promoting this day as a day of service to honor the life and teachings of Martin Luther King, Jr. |
| National AmeriCorps Week | 2020 TBD | National AmeriCorps week provides the perfect opportunity for AmeriCorps members, alums, grantees, program partners, and friends to shine a spotlight on the work done by members-and to motivate more Americans to serve their communities. Many events are scheduled across the country. Individuals and organizations with a special interest in AmeriCorps-especially, members, programs, and alums-are encouraged to use their creativity to mark the week in any way they see fit. The choice is up to you! |
| Global Youth Service Day | April 17-19, 2020 | Over the past decade, Global Youth Service Day has brought together more than 13 million people in thousands of communities nationwide. For more information, visit www.gysd.org . |
| Celebrating People in Action National Volunteer Week | April 19-25, 2020 April 18-24 2021 | National Volunteer Week began in 1974 when President Richard Nixon signed an executive order establishing the week of April 10 -16, 2011 as an annual celebration of volunteering. Every President since has signed a proclamation promoting National Volunteer Week. National Volunteer Week has become the official time to recognize and celebrate the efforts of volunteers at the local, state, and national levels. For more information, visit www.PointsofLight.org. |
| Join Hands Day JOINHANDS DAY it starts with us | May 2, 2020 May 8, 2021 May 7, 2022 | The goal of Join Hands Day is to begin making connections and friendships across generations that will continue long after the day is over. Developing these relationships is essential to creating healthy organizations, neighborhoods, and communities. For more information, visitwww.joinhandsday.org. |
| Make a Difference Day Make A DIFFERENCE DAY | October 26, 2019 October 24, 2020 | Sponsored by USA Weekend and Points of Light Foundation, is held each year on the fourth Saturday in October. See www.makeadifferenceday.com for more information. |

| Event | Date(s) | Description |
|--|----------------------|--|
| Family Volunteer Day Volunteer Day Organia | November 23, 2019 | The Points of Light Foundation launched the Family Matters initiative to encourage and engage families in community-oriented projects. National Family Volunteer Day is held the Saturday before Thanksgiving every year and kicks off National Family Volunteer Week as part of an annual public awareness. For more information, visit www.pointsoflight.org. |
| National Day of Service & Remembrance SEPTEMBER 11TH AND REMEMBRANCE AND REMEMBRANCE | September 11th | By pledging to volunteer, perform good deeds, or engage in other forms of charitable service during the week of 9/11, you and your organization will help rekindle the remarkable spirit of unity, service and compassion shared by so many in the immediate aftermath of the attacks. And you'll help create a fitting, enduring and historic legacy in the name of those lost and injured on 9/11, and in tribute to the 9/11 first responders, rescue and recovery workers, and volunteers, and our brave military personnel who continue to serve to this day. For more information, visit Join the Tribute. |

2.3 National Service Programs



The National and Community Service Trust Act of 1993 initiated the Corporation for National and Community Service (CNCS). The Corporation supports a range of national and community based service programs, providing opportunities for Americans to serve as full-time and part-time stipend participants or volunteers, and as individuals or as teams.

CNCS provides opportunities for Americans of all ages and backgrounds to serve their communities and the nation through three programs: AmeriCorps, Senior Corps, and Learn and Serve America. Members and volunteers serve with national and community nonprofit organizations, faith-based groups, schools, and local agencies to help meet pressing community needs. CNCS is part of USA Freedom Corps, the White House initiative to foster a culture of citizenship, service, and responsibility, and to help all Americans answer the President's Call to Service. CNCS fosters civic responsibility, strengthens the ties that bind us together as a people, and provides educational opportunity for those who make a substantial commitment to service.

For more information, please visit CNCS's Strategic Plan.

Program Description This program's goals are getting things done, strengthening community, and encouraging responsibility. Members receive educational awards in return for service. The AmeriCorps network consists of a wide variety of diverse programs in every state of the nation.

Program Description Program Name With a thirty-five year tradition of working with community groups to help low-income people help themselves, VISTA focuses on capacity building helping local organizations develop plans, raise funds, coordinate programs, and recruit and train local volunteers to effectively serve those in need. The National Civilian Community Corps involves young people ages 18-24 in performing community service projects. This program is a residential service program in which members are housed and trained together on military bases, and deployed as teams to service sites across the nation. NCCC members conduct service projects with a special emphasis on protecting the environment, promoting public safety, and responding to natural disasters. Senior Corps engages older Americans - with their great skills, talents, and experience - in addressing urgent issues facing the nation, in one of three programs: Foster Grandparents, who serve one-on-one with young people who have special needs: Senior Companions, who help other seniors live independently in their homes; and Retired and Senior Volunteer Program (RSVP) volunteers, who work with local groups to meet a wide range of community needs. The mission of Citizen Corps is to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared to respond to the threats of terrorism, crime, public health issues, and disasters of all kinds. For more information about Citizen Corps, visit www.citizencorps.gov.

2.4 Organization

A. CNCS (Management and Organization)

As the primary federal source of funding for national volunteer activities, CNCS is obviously the most important "player on the field". AmeriCorps operates in a decentralized manner that gives a significant amount of administrative responsibility to states and national and local nonprofit groups. CNCS realizes that the many organizations and individuals around the country with which it shares administrative responsibility for AmeriCorps will look to it for assistance on a broad range of issues and problems.

The <u>Board of Directors</u> and Chief Executive Officer are appointed by the President and confirmed by the Senate. The Chief Executive Officer oversees the agency, which includes about 700 employees operating throughout the United States and its territories.

- 1. Executive Leadership
- 2. CNCS State Offices

The <u>Board of Directors</u> 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.

B. CNCS State Office

CNCS also operates offices in each state. These offices are responsible for administering AmeriCorps*VISTA projects as well as the three Senior Corps programs. The CNCS employees in these locations assist with the monitoring of National AmeriCorps programs sites, solicit and review Martin Luther King Jr. Day of Service grants in their states, and participate in cross-program planning initiatives, including development of State Service Plans. One of them, usually the state office director, serves as an ex-officio member of the State Service Commission. The Hawai'i Acting State Office Program Director is Raga Nadella.

C. America's Service Commission (ASC)

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.

2.5 Hawai'i Commission for National and Community Service (HCNCS)

A. Serve Hawai'i with Aloha

Hawai'i's AmeriCorps*State programs are administered by the Hawai'i Commission for National and Community Service. Recognizing the state's unique Hawaiian heritage and instilled with the values of many cultures and peoples, the Commission is guided by the principles of

- manuwahi to give freely,
- kōkua to support, assist,
- laulima to work together,
- and lōkahi *unity, harmony*

We shall support and nurture the development of a firm, lifelong commitment to serve Hawai'i's people, from the keiki (children), makua (parents and adults), to the kupuna (grandparents and elderly). We shall encourage increased participation in community service for the enhancement of the quality of life and diversity of Hawai'i's people. We shall malama (care for) the environment and natural resources; incorporate 'ohana (family) strength and values; build on and enrich cultural, educational, and economic aspects of our community; and develop partnerships among grassroots, nonprofit, corporate, local, state, national, public, and private sectors. We shall support community driven service initiatives and unify state and national directives within a framework that effectively facilitates communication and collaboration among all levels of leadership.

B. Funding Opportunities

There are two opportunities for AmeriCorps funding. Available in the spring, the HCNCS puts out a Request for Proposal (RFP) for a Formula Grant. These Formula funds are appropriated to each State based on population. The funds for the Competitive Grant process are available in the fall whereby organizations compete for funding at the national level. Both grant opportunities a competitive process and are posted on the HCNCS website:

http://AmericorpsHawaii.org/funding

HCNCS works with interested applicants to determine which funding stream is the best fit for their program model and capacity. All new and recompete applicants are encouraged to submit a Letter of Intent to begin the process and a full application due at a later date. This process is subject to change based on available. Applicants that are not funded through the national Competitive process are eligible to apply through the Formula process.

Funding for AmeriCorps programs in Hawai'i is available to non-profit organizations, state agencies, public entities, faith based and tribal organizations. Throughout the year, HCNCS staff conducts outreach meetings and invites eligible organizations to attend and learn about AmeriCorps.

Most of the grants awarded by HCNCS (and CNCS) are cost reimbursable. This means HCNCS will reimburse the program for actual costs incurred. In order to operate a cost reimbursable grant, the programs must have

some cash on hand in order to pay for immediate expenses. The program on a monthly or quarterly basis submits reimbursement requests.

With the 2009 Serve America Act, the Corporation for National and Community Service offered the opportunity for Fixed-Amount Awards. These awards allow sponsors to apply for a fixed-amount per Member Service Year (MSY). In Hawai'i, only experienced AmeriCorps grantees in excellent standing and with at least 3 years' experience are invited to apply for this type of grant award. Under fixed-amount grants, grantees do not have an approved budget in their grant award and do not have specific restrictions on the use of the grant funds because the amount of the grants are significantly less than the cost of conducting the program.

Chapter 3 – Program Support

HCNCS provides ongoing support to assist programs with achieving their performance measures and providing a high quality member experience. Some of the ways in which HCNCS staff supports programs include:

3.1 Staff Development and Support

The Commission provides support to program staff and potential partners through coordination and implementation of training and events. Included are:

- 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.
- **Monthly Calls**: In order to recap some of the more recent communications coming from our office and highlight upcoming dates of importance, HCNCS staff hosts monthly update calls for AmeriCorps program staff. These calls are scheduled to occur the first Wednesday of every month at 10:00 AM. HCNCS Staff will send out reminder e-mails to participants the day before the call with the call-in information.
- Program Directors' Meetings: (mandatory) Subject to funding available, HCNCS will coordinate
 meetings for AmeriCorps Program Directors two times per year. The full (possibly two) day meetings include
 reports, updates and discussion of current topics in national service. Meetings also include training and
 time for peer interchange.
- **Specialized Training**: (mandatory, if held) Subject to funding availability, HCNCS will coordinate specialized trainings. In the past, these have included *Data Collection*, *Evaluation*, and *Performance Measure Institute*. Ideally, trainings will be held in conjunction with the Program Directors' Meetings.
- **Pacific Region Training**: CNCS sponsored regional meetings are held each year, when funds are available. A State Commission hosts these meetings. Training is specific to program level as well as Commission level. Information on this training will be sent out to programs when received. Although this is not a mandatory training, it is highly encouraged.
- **Web-based resources**: CNCS maintains a website where information and resource links are easily accessed for AmeriCorps program needs. https://www.nationalservice.gov/resources/americorps
- **OnCorps™**, is a web based reporting system contracted by HCNCS. Its use is required for all AmeriCorps programs in our portfolio. OnCorps provides regular webinars for free. Research and register for trainings here:
 - www.hawaii.oncorpsreports.com. Note: HCNCS will provide each program with log-on information.
- **Basecamp**: a project management app managed by HCNCS Staff, accessible to Programs in your browser and on your phone. You can find Resources to manage your programs, and message and chat with Commission staff and other Program Directors.

3.2 Hawai'i Commission Sponsored Training and Event Reimbursement

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

Important Note: HCNCS 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.

3.3 Communication

HCNCS is here to support you. Feel free to contact us with specific questions and or requests for technical assistance. We will make every effort to keep you informed and avoid delays in responding to program inquiries. In turn, we ask that Program Directors keep us informed of extended leave or situations that may cause them to be out of touch. Program Directors are responsible to make every effort to respond to HCNCS request in a timely manner and it is recommended that another program staff be designated to serve as the alternate contact to serve as the Program Director in his/her absence. The alternate should be able to attend meetings, conference calls, and make time-sensitive decision when the Program Director is unavailable.

A. When to contact HCNCS

Please notify us with situations similar but not limited to the following:

- 1. Inability to fill all awarded slots
- 2. Significant retention issues
- 3. Serious injury or death occurring to an AmeriCorps member during their service
- 4. Staff or Host Site changes
- 5. Reduction (25% or more) of time at Program Director
- 6. Absence of Program Director (for 3 or more months)
- 7. Changes to key personnel identified in the application or award document
- 8. Challenges to meeting performance measures
- 9. Developments or delays that have significant impact on funding activities
- 10. 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

You are **required to request permission/authorization** for the following:

- 1. Use of paper enrollment/exit forms
- 2. Slot conversions
- 3. Term of service changes
- 4. Contract period & program year modifications or extensions
- 5. Early exits for Compelling Personal Circumstances: Employment
- 6. Substantial changes in the level of participant supervision
- 7. Changes in scope, objectives or goals of the Program regardless if it affects budget changes
- 8. Modification to performance measures
- 9. Modification to budget
- 10. Entering into additional sub awards or contracts for AmeriCorps activities funded by the award, but not identified or included in the approved application and grant budget

It is required that a program report management/supervisory staff turn over, changes in partner/sponsor relationships, changes in board membership, significant participation attrition, service sites and other significant changes to HCNCS within 10 days of the change regardless of whether you will include the information in your next progress report.

Chapter 4 – Core Competency

These core competencies are intended to provide Hawai'i AmeriCorps programs and prospective applicant organizations 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 and can take a collective effort by more than one staff person at each organization managing an AmeriCorps program.

| | AmeriCorps Program Staff should possess the ability to: | |
|--|---|---|
| agement | Program Management | Develop and maintain sound fiscal and organizational management systems and practices compliant with federal laws and regulations, CNCS requirements, Hawai'i Commission, and University of Hawai'i policies and procedures. |
| Effective Grant and Program Management | 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. |
| e Grant and | 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. |
| Effectiv | 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 | 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. |
| Oversight nagement | 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. |
| Fiscal Oversigl and Manageme | 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. |
| Leadershi p Develop ment | 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. |

These charts can be used to assess you or your team's development. Effective AmeriCorps grant and program management consists of but not limited to the following areas:

| Program Management | Develop and maintain sound fiscal and organizational management systems and practices compliant with federal laws and regulations, CNCS requirements Hawai'i Commission and University of Hawai'i policies and procedures. | | | | |
|--|--|---|--|---|--|
| Indicator | Expert | Strong | Emerging | Limited | |
| Programmatic Record Keeping | Annually revises and modifies record keeping process to adhere to CNCS, Hawai'i Commission, and University of Hawai'i 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 an4d Conditions and regulations and Hawai'i Commission 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 Hawai'i Commission policies and procedures. | Limited knowledge of approved grant application, CNCS Terms and Conditions and regulations and Hawai'i Commission 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 HCNCS manual, federal regulations, Terms and Conditions, application instructions, etc. | Limited knowledge of federal and state requirements. | |
| Communication | Maintains regular communication with HCNCS Program Officer regarding all facets of the program through regular reporting, appropriate notice and request for amendments, etc. Reads and responds to HCNCS communication on a regular and timely basis. | Provides updates to HCNCS of developments as required by CNCS and HCNCS. Communicates with HCNCS during regularly scheduled meetings/calls. | Provides updates, as needed, to HCNCS staff of critical developments. Responds to inquiries from HCNCS. | Limited communication with HCNCS staff. Lack of responsiveness to HCNCS inquiries and failure to respond/participate in HCNCS calls. | |

Theory of Change & Continuous Improvement

Define and revise a Theory of Change on how program activities will lead to long term results, including performance measures with outputs/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.

| Indicator | Expert | Strong | Emerging | Limited |
|----------------------------|--|--|--|---|
| 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 demonstrates 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. | | | | | |
|--------------------|---|--|--|--|--|--|
| Indicator | Expert Strong Emerging Limited | | | | | |

| | | | 1 | |
|-----------------------------|---|--|--|---|
| 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 HCNCS 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/ 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 site supervisor manual to support effective site management. | Conduct annual site supervisor training. Offer opportunities for informal communication with site supervisors. Provide written guidance 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 compliance and 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. | | | |
|---|---|---|--|---|
| Indicator | Expert | Strong | Emerging | Limited |
| Collective Impact Model | Key partner in aligned cross- sector strategy designed to address the same goals and | Established collaborations that provide mutual benefits | Begins to do outreach and make connections in the community; joins | Limited knowledge of outreach and collaboration |

| | measuring the same impact through coordinated action and shared learning. Effort includes government, corporate and nonprofit sectors, with backbone organization and continuous communication. | resulting in achievement of common goals; viewed as key resource by other organizations and community leaders. | existing networks and establishes relationships to position the program. | 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 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. | | | | |
|------------------------------------|---|--|--|---|--|
| Indicator | Expert | Strong | Emerging | Limited | |
| 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 HCNCS 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. | |

| 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. | | | | |
|---|--|--|---|--|--|
| Indicator | Expert | Strong | Emerging | Limited | |
| 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 HCNCS 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 HCNCS. 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 | Conduct monitoring of member service hours to ensure members are able to complete their service | Works with member who identifies likely challenges with completing term to | Failure to monitor member hours or adequately address failures from the site to | |

| | activities to successfully complete their service. Work to proactively ensure members have proper support at their member service sites. | hours. Address supervisory issues as necessary. | ensure service hour requirements are met. Members are informed about how to report problems w/ supervisors. | 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. |

| 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. | | | |
|---------------------------------|---|--|--|---|
| Indicator | Expert | Strong | Emerging | Limited |
| 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 HCNCS & CNCS required components. | Limited knowledge of or participation in budget development. Unable to identify HCNCS & 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. | | | |
|---|---|---|--|--|
| Indicator | Expert | Strong | Emerging | Limited |
| 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. | | | |
|--|--|---|--|--|
| Indicator | Expert | Strong | Emerging | Limited |
| 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. |
| HCNCS Trainings | Regular and active participation by staff and members in HCNCS-sponsored training opportunities. Brings personal knowledge and shares information with others. | Some participation by staff and members in HCNCS-sponsored trainings and offers input on future training topics. | Choose either Strong or Struggling | Little or no participation by staff and members in HCNCS-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. |

Chapter 5 – Program Management

5.1 Financial Management

The grantee has full fiscal and programmatic responsibility for managing all aspects of grant and grant-supported activities, subject to the oversight of HCNCS. 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 HCNCS, the University of Hawai'i, and CNCS for its operation of the HCNCS 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.

A. 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. This section references:

- Code of Federal Regulations
- State & Local Regulations
- Notice of Funding Opportunity
- Notice of Grant Award and RFP
- Certifications and Assurances
- Approved Grant Application and Provisions

Code of Federal Regulations, <u>45 CFR, 45 CFR Subtitle B, Chapter XXV</u> contains the regulations for the Corporation for National and Community Service. Sections in these regulations were amended to <u>update National Service Criminal History Check regulations</u>. 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.

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 coverage, etc. Each program is expected to comply with all federal and state laws.

C. Grant Terms and Conditions

https://www.nationalservice.gov/resources/terms-and-conditions-cncs-grants

(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. Be sure to review both the Terms and Conditions for AmeriCorps State and National Grants and the General Terms and Conditions.

D. Grant Award & Agreement

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.

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 HCNCS Staff.

The Request for Proposals (RFP) and application instructions contain specific financial details that change on an annual basis (i.e. maximum living allowance, member benefits, etc.).

The Grant Agreement issued by HCNCS that governs the grant in Hawai'i 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.

E. 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.

5.2 Program Identification

As agreed in the *Terms and Conditions*, a program that is part of the AmeriCorps National Service Network and AmeriCorps Hawai'i, 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

All subgrantee as agreed in the *Terms and Conditions, Specifics III.B*, shall clearly state on program websites that they are an AmeriCorps subgrantee and shall prominently display the AmeriCorps logo. The subgrantee may not alter the AmeriCorps or AmeriCorps Hawai'i logo, and can individualize the logo with their program name only in accordance with the CNCS' guidelines. Programs must obtain the written permission of CNCS, through HCNCS (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 AmeriCorps Hawai'i name or logo in advertising or other promotional materials without the express written permission of CNCS, obtained through HCNCS. Permission may be withheld if recognition of the donor is inconsistent with the Hawai'i Commission's and the Corporation's policies.

*To create a Program Specific logo, you may use the America Learns logo generator: https://americalearns.com/americorpslogo/

B. Member Service Gear

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 <u>Industries of the Blind</u> located in Milwaukee. HCNCS 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. 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 AmeriCorps Hawai'i Program.

5.3 Performance Measures & Grantee Progress Reports

A. Performance Measures

In accordance with 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.

Modifications

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:

- Why you are not on track to meet performance requirements
- How you have been tracking the performance measure
- Evidence of the corrective actions you have taken
- Any new proposed performance measures, targets, and/or instruments

Your plan to ensure that you meet any new measures

PM modification requests must be submitted to HCNCS within 30 days of determining that you are not on track to meeting your performance measures. A request letter (email or otherwise) must be received by HCNCS before formal consideration will be given to a modification request.

Commission staff will review the performance measure progress reports and may request verifying documents or other supporting documents to determine whether programs are on track to meet their measures. If it is determined that the program has not made appropriate progress, the program will need to develop a corrective action plan. Similarly, programs that identify challenges to meeting their performance measures at any time during the year should immediately notify HCNCS Staff.

B. Grantee Progress Report

Grantee Progress Reports (GPR), are due mid program year and at the end of each program's service year. A program specific form fillable PDF Progress Report will be e-mailed to Program Directors to complete. The GPR forms should be completed in the timeframe specified by HCNCS.

The GPR is built from several components, in My AmeriCorps and eGrants, including:

| MEMBER DATA | Enrollment -My AmeriCorps Exits -My AmeriCorps Time Logs |
|-------------------------|--|
| PERFORMANCE MEASURES | Data continually collected by program Reported to HCNCS via a semi- annual pdf form |
| GREAT STORIES | Member and/or Program Success StoriesSubmitted to HCNCS via email |

5.4 Data Collection

A. Data Quality Policy

HCNCS is committed to ensuring high quality of data is collected and reported from sub-grantees. HCNCS engages in dialogue with sub recipients about the underlying processes used to gather and handle data regarding the following elements: validity, completeness, consistency, accuracy and verifiability.

Validity – addresses whether the data collected and reported appropriately relates to the approved program model and whether or not the data collected corresponds to the information provided in the grant application. In evaluating validity, HCNCS staff will determine if the performance measure data being collected appear to measure the project's demographic data, performance measures, and/or outcomes.

Completeness – data reported to HCNCS are considered complete when the grantee collects enough information to represent an activity, a population, and/or a sample. In evaluating completeness, HCNCS staff will determine if the data collected and reported contains enough information to represent the activities or population as related to the performance measure.

Consistency – addresses the extent to which data are collected using the same procedures and definitions across collectors and sites over time. Consistency indicates that the data provide a reliable source of information to assess the long-term performance of the program and helps minimize data collection variation and maximize uniformity.

Accuracy – addresses the extent to which data appears to be free from significant errors. While data deviations and variations are expected, data must be reasonably accurate to be useful. For data to be considered accurate, deviations can be anticipated or explained, and errors are within acceptable limits.

Verifiability— addresses the extent to which recipients follow practices that govern data collection, aggregation, review, maintenance, and reporting. This element goes one step further than assessing if data appear free from significant error. Verifiability looks at the processes grantees have in place to help identify, mitigate, and rectify weaknesses in data collection, analysis, and reporting.

B. Data Quality Procedures

In order to prevent the likelihood of programs not having high data quality, HCNCS conducts the following prevention-focused activities:

Grant Review and Clarification: During annual grant review (New, Recompete, and Continuation), aside from the HCNCS Commissioner grant reviewers, Staff will have one or more CNCS-trained grant reviewer(s) specifically review all grant application narratives and performance measures to ensure the applicant addresses data quality. The HCNCS grant reviewer(s) carefully review the application for evidence that the program has described a strong system for data quality, as well as for any red flags that suggest the program may not be in compliance requirements. If any red flags are detected, the applicant must go through additional clarification; if for any reason resolution of the concerns or questions is not able to be reached, the grant application would not be considered for funding.

Pre-Award Visits: For newly selected AmeriCorps sub-recipients, HCNCS Staff and/or its consultant(s) will conduct a Pre-Award Start-Up Visit prior to issuing the Notice of Grant Awards (NOGA). During this on-site visit, Staff provides initial, face-to-face training and technical assistance related to the program launching. During this visit, Staff discusses how the program will ensure they have systems in place related to data quality.

Ongoing Training & Technical Assistance (TTA): HCNCS sub-recipients also receive frequent, regular training and technical assistance coaching from HCNCS staff, including required Monthly Conference Calls. The topic of data quality periodically comes up from sub-recipient staff.

In order to ensure swift detection of any compliance issues related to Data Quality, HCNCS conducts the following detection-focused activities:

Monitoring Visits: Per HCNCS's Monitoring Policy and Plan, HCNCS Staff conduct a rigorous, on-site monitoring visit of sub-recipients at least once during each three-year grant cycle. During formal monitoring visits, HCNCS Staff schedule a meeting with the program to complete the CNCS Performance Measures Data Quality Self-Assessment document with the program. This document includes the topics of validity, completeness, consistency, accuracy and verifiability. If any action items need to be addressed from the discussion, they will be included in the monitoring report.

AmeriCorps Progress Report Review: During the mid-year and end of year APR review, HCNCS Senior Program Officer complete a careful review of sub-recipients' APR. This review occurs twice per year for the mid-year and end of year report. The Senior Program Officer reviews performance measures, demographics information, and member data reported for validity, completeness, consistency, accuracy and verifiability. If the Senior Program Officer detects any potential errors or items that need clarification, they will be addressed in the APR Review document sent to the program with action items.

Data Dive: On a yearly basis, HCNCS Program Officer completes a data dive for sub-recipients. This review occurs after the mid-year AmeriCorps Progress Report is submitted. In this review, the PO conducts a basic test of the accuracy and verifiability of one data point reported in the current year Mid-Year APR or the most recently completed End-of-Year APR. Selecting a sample to test is not intended to signal more importance for one type of data over that of another. All data submitted as part of progress reports are potentially subject to testing and review. Once the data point is selected, the following questions are asked in the review:

Please provide your data collection and aggregation procedure or other documentation that would demonstrate that you have a replicable process for compiling the data point.

Please provide documentation (chart, collection of reports, etc.) you used to tabulate the aggregated results reported on the 201X-1X Mid-Year or End-of-Year APR to arrive at the value listed above

Once the data dive is submitted, the Staff reviews the responses and supporting documentation submitted. If

any clarification questions are required, they will be addressed in the data dive report.

On-Going Detection: On an on-going basis, the HCNCS Staff carefully listens and observes during monthly calls, community events, trainings, and impact visits to detect if programs are not meeting the data quality requirements.

In order to handle and resolve any compliance issues related to data collection requirements, HCNCS conducts rigorous enforcement activities.

Examples of enforcement activities for any sub-recipient found to be out of compliance with grant terms and conditions may include (but are not limited to) the following:

- 1. Verbal or Written Warnings
- 2. Mandated Training & Technical Assistance
- 3. Notices of Non-Compliance
- 4. Corrective Action Plans
- 5. Notification to sub-recipient executive management and/or Board
- 6. Notification to CNCS or Office of Inspector General's office, depending on severity
- 7. Withholding of some or all of funds owed to sub-recipient if the non-compliance or performance issue puts HCNCS at risk of financial penalty or sanction
- 8. Contract termination in accordance with § 2543.61 Termination, § 2541.430 Enforcement, and HCNCS terms and conditions

5.5 Evaluation

A. Internal or Independent Evaluation

As articulated in the AmeriCorps regulations (45 CFR 2522.500-540 and 45 CFR 2522.700-810; Annual NOFO/RFP), AmeriCorps State grantees (with the exclusion of Education Award Program grantees) that receive an average annual CNCS grant of \$500,000 or more must conduct an independent evaluation to measure the impact of programs. An evaluation is considered independent if it uses an external evaluator who has no formal or personal relationship with, or stake in, the administration, management, or finances of the grantee or of the program being evaluated. An impact evaluation is designed to provide statistical evidence of the impact of the program compared to what would have happened in the absence of the program (i.e. evaluations that include a comparison or control group). For further information on the requirements for an independent evaluation that measures program impact, see CNCS FAQs regarding Evaluations: Evaluation FAQs.

In addition, see <u>Evaluation Resources</u> on the Knowledge Network for valuable resources for evaluation-related information.

The \$500,000 threshold is calculated by averaging the AmeriCorps grant funding amounts over the last three years the grantee has received CNCS funding at the time of the re-competition. The \$500,000 threshold is based on CNCS funding, not the program's total budget with matching funds. AmeriCorps National Direct grantees and State Competitive grantees with average grants of less than \$500,000, as well as all AmeriCorps Education Award Program grantees, are required to conduct an evaluation, but may use an internal evaluator rather than an independent one. An internal evaluation is designed and conducted by qualified program staff or other stakeholders, such as board members, partners, or volunteer affiliates.

Evaluations of AmeriCorps State funded programs must cover at least one year of CNCS-funded service activity.

| If you are a | The following evaluation requirements apply |
|---|---|
| State Competitive or Formula grantee with an average annual CNCS grant under \$500,000 | Internal or Independent Evaluation |
| State Competitive or Formula grantee with an average annual CNCS grant of \$500,000 or more | Independent Impact Evaluation |

B. Timing of Evaluation Requirements (RFP)

Evaluation plan requirements for applicants that are not competing for the first time includes the following:

- If the applicant has been competitively funded for at least three years and if it satisfies the CNCS definition of same project (see definition below) the applicant must submit an evaluation plan.
- If the applicant has not been competitively funded for at least three years and if it satisfies the CNCS definition of same project, it will not be required to submit an evaluation plan or completed evaluation report.
- If the applicant has been competitively funded for at least six years for the same project, the applicant will be required to submit an evaluation report as well as an evaluation plan for the upcoming 3-year grant.

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, and utilize the same sites.

CNCS will consider a project to be new if there is a meaningful difference between it and previous projects in comparison of the following characteristics, among others: the objectives and priorities of the projects; the nature of the services provided; the program staff, participants, and volunteers involved; the geographic locations in which the services are provided; the populations served; and the proposed community partnerships. (§ 2522.340)

C. Reporting on Evaluation

There is flexibility on what the evaluations should contain and how they should be structured. HCNCS staff or its consultants 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

5.6 My AmeriCorps Portal

My AmeriCorps (https://my.americorps.gov) is an online space designed to help members manage their AmeriCorps experience and it helps programs manage their program's recruitment and enrolled members. It provides an easy way for individuals to get and give important information.

For Potential and Current AmeriCorps Members

This site makes it easy to search and apply for AmeriCorps service opportunities in all three AmeriCorps programs. After registering and creating a profile, potential applicants can apply and allow programs to offer service opportunities to them. For those who apply to a program, My AmeriCorps makes frequently used and requested forms available online at any time.

For AmeriCorps Programs

HCNCS sub-grantees, and all AmeriCorps programs, can access the My AmeriCorps Portal through the eGrants system. Through the Portal, programs can post service opportunities, extend offers to accepted applicants, enroll members, exit members, and complete slot conversions (after HCNCS approval). For more information on using the My AmeriCorps Portal, please visit the Corporation's Resource Center at: https://www.nationalserviceresources.gov.

5.7 Refill Policy

With the exception of recipients whose awards have special award conditions under 2 CFR §§ 200.207 or 200.338, AmeriCorps State and National programs that have fully enrolled their awarded member positions are allowed to replace any member who terminates service before completing 30 percent of his/her term provided that the member who is terminated is not eligible for and does not receive a pro-rated education award.

Programs may not refill the same member position more than once.

As a fail-safe mechanism to ensure that Corporation resources are available in the National Service Trust to finance any member's education award, CNCS will suspend refilling if either: total AmeriCorps program enrollment reaches 97% of awarded slots or the number of refills reaches five percent of awarded slots

Members who are refilling a slot need to complete all the hours of the designated slot (not just the remaining hours from the original member) in order to earn the Education Award. For instance if the original full time member only completed 300 of the 1700 hours, the member refilling the slot would need to complete the **full 1700 hours**, not just 1400 hours, in order to receive the Education Award. The Education Award may not be prorated unless the member has a compelling personal circumstance to terminate early.

A No-Cost Extension (NCE) may be requested and must be approved by the Hawai'i Commission in order for refill full time members to have a full 12 months to complete the 1700 hours; however, no additional Corporation funds will be awarded for living allowances, healthcare, childcare, etc.

Sub-grantees whose awards have special grant conditions are not eligible to refill positions.

5.8 Slot Conversion and Correction

A. Slot Conversion

As of November 13, 2006, the Corporation revised the slot conversion policy to allow programs to convert one full-time position to up to three quarter-time positions. A slot conversion is necessary when a program wants to convert an unfilled slot into less time slots.

All conversions will be Trust neutral, are subject to availability of funds in the Trust, and will comply with all assumptions on which Trust prudence and continued solvency are predicated. This policy allows AmeriCorps slots to be converted in accordance with the grant award (AmeriCorps General Provision, Section 8, Terms of Service) but without regard to the limitation therein on increasing the number of slots in the program. Thus, when converting a slot to one requiring fewer hours, the grantee is not limited to a one-for-one slot conversion, and may increase the number of members correspondingly. **However, the total number of MSYs and education award amounts in the grant may not increase as a result of the slot conversion.**

For example:

- 1 full-time member position (1 MSY and a \$5,550 education award) may be converted into 2 half-time slots (2 x .5 members = 1 MSY) and a total education award amount of \$5,5550 (2 x \$2,775).
- 1 full-time member position **may not** be converted into 4 quarter-time positions as the education awards would total \$5,872 (4 x \$1,468); in this example, the maximum number of allowable quarter-time positions would be 3.

The following Chart shows the MSY values by position type:

| Term of Service | MSY |
|--------------------|--------|
| Full-time | 1.000 |
| Three-Quarter-Time | 0.7000 |
| Half-Time | 0.500 |
| Reduced-Half-Time | 0.3810 |
| Quarter-Time | 0.2646 |
| Minimum-Time | 0.2116 |

Sub-grantees 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.

**Although the new My AmeriCorps Portal allows for sub-grantees to make their own slot conversions, all HCNCS sub-grantees must follow the above procedure to request slot conversions. If a program makes their own slot conversion without prior approval by HCNCS AmeriCorps Program Officer, the sub-grantee will be out of compliance with their grant agreement and it will be noted in their file.

B. Slot Correction

A slot correction is necessary when a program needs to increase or decrease the number of slots awarded in the grant. The number of MSYs specified in the grant contract will be altered by this request.

Only a HCNCS AmeriCorps Program Officer can only process a slot correction. Once approved, the request will be sent to the grants officer at the Corporation.

C. Unfilled Member Positions/Position Transfer

In some cases, HCNCS has the ability to move a program's unfilled member positions to another program(s) within the same prime grant; therefore, HCNCS 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 HCNCS 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 HCNCS as soon as possible, in order to allow adequate time for Commission Staff 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. CNCS expects 100% enrollment and 85% retention rates for AmeriCorps programs.

5.9 No-Cost Extensions (NCE)

No individual member contract may exceed 12 months. Regardless of slot type, all Hawai'i AmeriCorps members must complete their terms of service within 12 months from the program start date. Grantee Subawards between the Organization and the Hawai'i Commission under the University of Hawai'i cover a 12-month period; therefore, a Grant Agreement amendment for a no-cost extension would be required for any activities beyond that period. Without an extension, the Commission will not reimburse any member costs incurred after 12 months from the Hawai'i Commission Grant Agreement start date.

With approval from CNCS (when grant award is in its final year of the 3-year cycle), the Hawai'i Commission, and the University of Hawai'i Office of Research Services, 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 eliqible 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. In order to do so, the program must request a no-cost extension. This should come as a written (e-mail) 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 30 days before the Subaward end date.

Chapter 6 – Member Benefits

Reference: NOFO/RFP, Terms and Conditions and 45 CFR 2522.240-45 CFR 2522.250

6.1 Living Allowance

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. Reference: (Terms and Conditions - Specific VIII.A, B, C and 45 CFR 2522.240)

A. 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: There are no sources in the current document.

B. No Hours Served in a Pay Period

Please refer to section

No Hours Served in a Pay_Period_ in Chapter 11 of this Handbook.

C. Taxes

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

6.2 Workers Compensation Insurance

(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. Hawai'i requires that all AmeriCorps programs receiving funding through HCNCS to operate an AmeriCorps program provide Workers Compensation insurance for their AmeriCorps members. This Commission policy is created in response to the Corporation for National and Community Service (CNCS) requirement that AmeriCorps programs provide coverage for "on-the-job" injuries.

A. 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.

6.3 Unemployment Insurance

AmeriCorps members are not considered employees for the purposes of unemployment insurance coverage, with the exception of Professional Corps members. Hawai'i Department of Labor has ruled that AmeriCorps members are not entitled to unemployment compensation. 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.

6.4 Health Insurance Coverage for Full-time Members

(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. It is the program'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.

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.

6.5 Child Care for Full-time Members

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.

CNCS will not cover childcare costs for members who served on a less than full-time basis for a sustained period of time, or who have ceased serving or who are serving in a Professional Corps program. 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 may use the <u>AmeriCorps Childcare Program Member Update form</u> to notify GAPSI and document that notification.

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

For more information on Child Care, please visit http://www.americorpschildcare.com

6.6 Loan Forgiveness, Forbearance and Interest Accrual Payments

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.

A. 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.

B. 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.

C. 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 AmeriCorps Hawai'i Program Director Handbook

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.

6.7 Eli Segal AmeriCorps Education Award

A. 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

B. 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 <u>Transferability</u>

(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.

C. 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.

D. 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.

E. 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 original date earned) to redeem it.

6.8 SSI, TANF and SNAP

A. Supplemental Security Income (SSI)

The HEART (Hero Earnings Assistance and Relief Tax) Act of 2008 specifies that any cash or in-kind benefit paid to a participant in the AmeriCorps program is excluded from the SSI income calculation. This means that SSI recipients can freely serve as AmeriCorps members without the fear of losing their SSI.

B. Temporary Assistance to Needy Families (TANF)

AmeriCorps members who otherwise qualify for aid programs may be affected by the living allowance and education award. Eligibility or amount of assistance may be affected in State or local public assistance programs. Temporary Assistance to Needy Families (TANF) is one of the programs that may be affected by the living allowance. If your AmeriCorps member is already receiving TANF, please have them contact their case manager to report their status as an AmeriCorps member.

C. Supplemental Nutrition Assistance Program (SNAP)

The AmeriCorps*State and National program was authorized by the National and Community Service Act of 1990 (NCSA), 42 U.S.C. § 12501 et seq. The NCSA states that allowances, earnings, and payments to participants in AmeriCorps programs "shall not be considered income for the purposes of determining eligibility for and the amount of income transfer and in-kind aid furnished under any Federal or federally-assisted program based on need, other than as provided in the Social Security Act." 42 U.S.C. § 12637(d). Based on this language, the USDA issued an opinion in 2001 stating that AmeriCorps*State and National benefits are excluded from income for food stamp purposes.

In short, a member's SNAP benefits are not affected because a member receives the AmeriCorps living allowance. This means that a member's benefits should not be decreased, increased, or terminated because he or she receives the living allowance.

For more information regarding Government Benefits and Participation in Service Programs please see the handbook on the CNCS website: www.nationalservice.gov/sites/default/files/resource/inclu_11.pdf

Chapter 7 - Site Management

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. HCNCS AmeriCorps programs are expected to monitor sites for compliance and provide technical assistance and support to continuously improve host site management and placements.

7.1 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 in the Appendix of this Program Director Handbook.

7.2 Site Selection

AmeriCorps Hawai'i 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) (45 CFR §2522.450 and 45 CFR §2522.475). 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.

7.3 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 including knowledge of Prohibited Activities and Non-duplication/non-displacement rules/regulations.

Chapter 8 - Member Management

8.1 Recruitment

A strong recruitment policy helps ensure the right person is selected for the right position. The lure of Hawaii helps draw a lot of curious and enthusiastic people to apply for AmeriCorps positions. Knowing how to attract the right person that has the skills, education and or personality is an important part of the foundation of your program. CNCS and HCNCS has a goal of 100% enrollment of the awarded slots. Not enrolling all of a program's slots could be a factor in future funding.

https://www.nationalservice.gov/resources/recruitment/volunteering-america-resources

A. Community Recruitment

As an AmeriCorps program, you must actively seek to recruit program members from the community in which the project is conducted. Members of diverse races and ethnicities, socioeconomic backgrounds, education levels, both men and women, and individuals with disabilities, unless and to the extent that the approved program design requires emphasizing the recruitment of staff and members who share a specific characteristic or background. However, in no case may you violate the nondiscrimination and non-displacement rules governing participant selection. The key to successful recruitment and engagement of AmeriCorps members is creating a comprehensive AmeriCorps Member Position Description. The Position Description is how you will 'sell' your program to prospective members, so be clear, concise, and honest about the service that members will provide.

B. National Recruitment

To supplement local recruitment efforts, the Commission requires your program to use the web-based My AmeriCorps Portal. All programs will be required to have their program on this system by the beginning of their program year. If you have problems or questions about this system, please visit https://my.americorps.gov

8.2 Disability Inclusion Initiative

HCNCS encourages individuals with physical or mental disabilities to participate as AmeriCorps members through AmeriCorps programs operating in the Hawai'i. We encourage a diverse membership that includes people with disabilities to participate as national and community service members through our many programs. Reference: (Terms and Conditions - Specific IV.C. and 45 CFR 2522.100(h)

A. Definition of Disability

According to the ADA, the term "disability" means, with respect to an individual, a physical or mental impairment that substantially limits one or more of the individual's major life activities, a record of having such an impairment, or being regarded as having such an impairment. "Major life activities" means functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, working, etc. Additionally, a "qualified individual with a disability" is an individual with a disability who, with or without reasonable accommodations, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the program.

B. Policy

Under Federal law, any program which receives federal funds is required to comply with the requirements of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. In compliance with the Federal law, all AmeriCorps programs prohibit any form of discrimination against persons with disabilities in recruitment, as well as in service. No qualified individual with a disability shall, by reason of disability, be excluded from participation in or be denied the benefits of the program, services, or activities of the program, or be subjected to discrimination by the program. Nor shall the program exclude or otherwise deny equal services, programs, or activities to an individual because of the known disability.

C. Reasonable Accommodation

In compliance with the Americans with Disabilities Act (ADA) (42 U.S.C. 12101, et seq.), programs must provide reasonable accommodations to the known mental or physical disabilities of members, and all selections and project assignments must be made without regard to the need to provide reasonable accommodations. As a Program Director, you may be called upon to make decisions regarding reasonable accommodation. However, the law does not require that you provide reasonable accommodations for any participant who would pose a direct threat to the health and safety of others even if accommodated.

A reasonable accommodation is any modification or adjustment to a program site that will enable a qualified applicant or AmeriCorps member with a disability to participate in the application process or to perform essential service functions. Reasonable accommodation also includes adjustments to assure that a qualified individual with a disability has rights and privileges in service equal to those of individuals without disabilities.

All AmeriCorps programs shall make reasonable accommodations in practices and/or procedures when the accommodations are necessary to avoid discrimination on the basis of disability. Accommodations are "reasonable" when they are practical or feasible. The program does not have to provide reasonable accommodations that would impose undue hardship on the operation of the program. According to the U.S.

D. Equal Employment Opportunity Commission (EEOC):

It is not necessary to provide a reasonable accommodation if doing so would cause an undue hardship. Undue hardship means that an accommodation would be unduly costly, extensive, substantial or disruptive, or would fundamentally alter the nature or operation of the business. Among the factors to be considered in determining whether an accommodation is an undue hardship are the cost of the accommodation, the employer's size, financial resources and the nature and structure of its operation.

Reasonable Accommodations May Include:

- 1. Making existing facilities accessible to and usable by an individual with a disability
- 2. Restructuring the job
- 3. Modifying the work schedule
- 4. Modifying existing equipment or devices
- 5. Installing new equipment or devices
- 6. Providing qualified readers and interpreters
- 7. Appropriate modification of the application and examination procedures and training materials

Reasonable Accommodations Do Not Include:

- 2. Eliminating a primary job responsibility
- 3. Lowering production standards that are applied to all employees
- 4. Providing personal use items, such as prosthetic limbs, wheelchairs, eyeglasses or hearing aids

8.3 AmeriCorps Position Listings

All positions for AmeriCorps members will be required to be listed in the MyAmeriCorps Portal. AmeriCorps programs will need to list member positions as Service Opportunities by creating a Service Opportunity Listing in My AmeriCorps portal.

This will enable all AmeriCorps open service opportunities to be publically accessible in one recruitment platform. CNCS believes a centralized recruitment platform will be helpful with AmeriCorps State and National recruitment because all potential AmeriCorps applicants will be able to view all service opportunities in one location.

If you have questions regarding the process of posting positions in the MyAmeriCorps Portal please contact HCNCS Staff. Additional resources about creating service opportunity listings and use of the on-line recruitment system can be found at: https://www.nationalservice.gov/resources/americorps/member-assignment-listings

8.4 Eligibility & Selection

The subgrantee is responsible for following the Corporation's eligibility requirements for members, namely that they must:

- 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 AmeriCorps Hawai'i Program Director Handbook

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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. Reference: (Terms and Conditions - Specific IX.B and (45 CFR 2522.200-45 CFR 2522.210)

A. Term Limits & Education Award Eligibility

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. Reference: (45 CFR 2522.235)

B. 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. Reference: Terms and Conditions - General III.L for non-discrimination guidance, in addition to 45 CFR 2522.100, and 2540.210.

C. 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 AmeriCorps Member Eligibility 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)].

8.5 Pre-Enrollment and Enrolling Members

Once your organization has recruited qualified individuals to serve in your AmeriCorps Program, it will be time to enroll the members into your organization and into the AmeriCorps system. As an AmeriCorps Program Director, you will find that the paperwork never ends and it starts with member enrollment.

All enrolled members must be assigned to a service location in eGrants/MyAmeriCorps Portal within seven (7) days of members' starting a term of service. All service locations should be described by name, full address and ZIP+4 code. If a member is serving at multiple service locations, the program must select as the member's primary assignment the one where the member serves a majority of his or her hours. However, all service locations must be listed in the portal.

Reference: https://www.nationalservice.gov/resources/member-enrollment-resources

Eligibility requires documentation of a member's status as a citizen or as a Legal Permanent Resident. CNCS requires documentation to "manually" verify eligibility whenever eligibility is not automatically verified based on social security number. In order to keep children and vulnerable populations safe, clearance for criminal history requires that members be checked and cleared prior to the start of service on National Sex Offender Public Website and that state and FBI checks as appropriate for the member and their service be initiated no later than the day members start their service.

You can find a helpful Pre-Enrollment Checklist in the Resource Library of Basecamp: https://3.basecamp.com/3624101/buckets/2212053/uploads/1974004878

For the New Member Enrollment Procedure PowerPoint go to: https://www.nationalservice.gov/sites/default/files/documents/Member_Enrollment_April_2019.pdf

For Frequently Asked Questions regarding the Pre-Enrollment process go to: https://www.nationalservice.gov/sites/default/files/communicationcenter/New%20Enrollment%20Steps%20FAQs %2030May2018%2C%20508.pdf

A. Recurring Pre-enrollment findings

Among the most common or recurring audit and monitoring findings for AmeriCorps State and National grantees are lack of documentation demonstrating member eligibility and late and incomplete NSOPW.gov, state, and FBI checks.

In order to address these persistent issues, the timing of the automated Social Security Number and citizenship verifications for AmeriCorps State and National members is being shifted to an earlier stage in the invitation and enrollment process. These checks will now occur at the time an applicant or invitee accepts an offer from the program, instead of being the last step a program takes when it enters Placement Information to enroll a member. By moving up the validity checks to earlier in the enrollment process, the verification results will be ready for review by the program the morning of the next business day after the member submits their acceptance.

This means that some programs may have to adjust the timing of their own applicant screening and selection practices to earlier in the process. CNCS is willing to adjust a program's start dates if this is NationalService.gov necessary. Grantees may also request approval for pre-award costs related to recruitment and screening if that would be helpful.

CNCS is also adding two boxes to the enrollment screen requiring program staff to certify they have conducted, reviewed and adjudicated a compliant NSOPW.gov check, and have initiated the state of service, state of residence, and FBI checks as may be appropriate for the specific individual in their proposed assignment. It is hoped that by compelling program staff to certify they have completed required pre-enrollment procedures, there will be greater compliance with these important applicant-screening steps.

These requirements will be included in a new section of the Enrollment Screen titled SSN, Citizenship, and Criminal History Check Verification Information that will display the SSN and Citizenship verification statuses, as well as the two-certification boxes for criminal history checks.

The Enroll Member button in the Placement Information section (the place where program staff enter the start date, program year, program title, service location, and slot type) at the bottom of the Enrollment Screen will not activate until a member's SSN and Citizenship statuses are Verified automatically or Manually Verified by CNCS Hotline staff, and program staff have certified completion of the NSOPW check and initiation of the State and FBI checks. This will prevent unfortunate financial consequences for programs by the inadvertent enrollment of ineligible individuals and we hope this will encourage greater compliance with criminal history checking requirements.

Consistently over the past seven years of data, the Social Security Administration verifies ninety-six percent of all members for both SSN and citizenship in the initial screening. Any cases where members are not able to be verified by Social Security will have to be resolved by the program submitting appropriate documentation that

validates the SSN status and/or supports citizenship or Legal Permanent Residence status before the member can be enrolled in the National Service Trust and start earning service hours. CNCS is building additional capacity to handle the pre-enrollment screening for the four percent of individuals that can't be confirmed by Social Security to address concerns by programs that this will unnecessarily delay their programs.

B. Additional Requirements

Programs will be required to complete the Placement Information section of the enrollment screen and take the Enroll Member action within 8 (eight) days of a member's start date. This is a reduction of the time permitted by program to take this same action under the existing 30-day enrollment process. The changes in the screens will prevent programs from entering or selecting a date-value earlier than eight days prior to the certification of enrollment date.

Chapter 9 - National Service Criminal History Check (NSCHC)

The National Service Criminal History Check (NSCHC) is a screening procedure established by law to protect the beneficiaries of national service. See 45 CFR §§ 2540.200-2540.207 and

http://www.nationalservice.gov/resources/criminal-history-check for complete information and FAQs. The law requires recipients to conduct and document NSCHCs on any person (including award-funded staff, national service participant, or volunteer) receiving a salary, living allowance, stipend or education award through a program receiving CNCS funds.

• An individual is ineligible to serve in a position that receives such CNCS funding if the individual is registered, or required to be registered, as a sex offender or has been convicted of murder.

The table below summarizes the requirements based on access to vulnerable populations. In most cases, programs determine their covered positions to have recurring access to vulnerable populations. Even if a program determines a position to not have recurring access to vulnerable populations, they may elect to conduct the checks as if the member did have access to vulnerable populations to reduce risk if the individual were ever later to be determined to actually have that heightened level of access. The Corporation recommends that the grantee specifically address contact with vulnerable populations in each position description, service agreement, or similar document describing an individual's service activities.

The cost of conducting NSCHCs is an allowable expense under the award. Unless CNCS has provided a recipient with a written exemption or written approval of an alternative search procedure, recipients must perform the following checks:

9.1 Check Requirements Based on Access to Vulnerable Populations

IF THE POSITIONS HAS **NO RECURRING ACCESS**

- National Sex Offender Public Website check
 - 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

- o FBI check see details at right
- Only can be used instead of Statewide check for individuals without recurring access

IF THE POSITION DOES HAVE RECURRING ACCESS

- National Sex Offender Public Website check
 - An individual may not serve/work prior to completion of this check
- 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 <u>not</u> substitute for the required statewide criminal history check(s)
 - Must initiate no later than the start of service or work

9.2 Minors

NSCHC Requirements for an Individual who **WILL turn 18 during Service**:

- The recipient must conduct these checks if the individual **has recurring access** to vulnerable populations:
 - NSOPW, name- or fingerprint-based State check(s) and fingerprint-based FBI check.
 - The individual is required to be accompanied during service while state check(s) or FBI check components are pending.
- The recipient must conduct these checks if the individual has no or episodic access to vulnerable populations:
 - NSOPW, name- or fingerprint-based State check(s) or fingerprint-based FBI check

NSCHC Requirements for an Individual who will NOT turn 18 during Service:

- The recipient must conduct these checks if the individual has recurring access to vulnerable populations:
 - o NSOPW, name- or fingerprint-based State check(s) **or** fingerprint-based FBI check.
 - The individual is required to be accompanied during service while state check(s) or FBI check components are pending.
- The recipient must conduct these checks if the individual has no or episodic access to vulnerable populations:
 - o NSOPW, name- or fingerprint-based State check(s) **or** fingerprint-based FBI check

An individual's age has no effect on the timing requirements of the checks specified in 45 CFR 2540.204.

If state law prohibits checks on individuals under 18, you must request an ASP from CNCS.

You must retain adequate documentation that you completed the required NSCHC. Inability to demonstrate that you conducted a required criminal history check component, to include the NSOPW, as specified in the regulations, may result in sanctions, including disallowance of costs or financial penalties. The documentation must demonstrate that, in selecting or placing an individual, the grantee or the grantee's designee (such as a site sponsor) reviewed and considered the background check's results (adjudication).

If your program enrolls members in a second term of service and the member has less than 120 days of a break in their service, your organization does not need to re-check the member.

9.3 **NSCHC Training**

The CNCS designated e-course provides a thorough overview of the requirements and can be found at: https://www.nationalservice.gov/reqCHCtraining

- Grant recipients that either 1) have covered positions for which an NSCHC is required or 2) are responsible for monitoring other organizations' NSCHC compliance must make sure that the appropriate staff complete the required training.
 - If the prime recipient centralizes the NSCHC process (meaning any subrecipient organizations do not independently conduct the NSCHC), then only the prime recipient staff is required to complete the NSCHC ecourse.
- All organizations, described in above, must have at least one person take the NSCHC training each year.
 - Although only one person per grant is required to take this training, CNCS strongly recommends making sure at least two people in every organization take the training, in order to limit the risk of noncompliance in case of unexpected absences or staff turnover.
 - Organizations with multiple grants from CNCS must have one person per grant take the training, unless a single person is responsible for managing the NSCHC requirements across all grants.
- The designated staff must take the training every calendar year and must maintain all certificates as grant records.
 - The organization must make sure that at least one person on staff always has an up-to-date certification from the e-course, continuously from the time that the first designated person at the organization successfully completes the training.
 - For example, if an individual in an organization first completes the e-course on June 1, 2017, either that same individual or another, appropriately designated, individual in the organization must complete the e-course again no later than May 31, 2018.
 - Organizations must keep this certificate to document compliance with the requirement for annual training and continuous certification. You must maintain all of the annual certificates as grant records, and store all of them with your organization's other NSCHC documentation.
 - Organizations must make sure their policies and procedures designate appropriate staff to complete the course.

All of the grantee staff positions identified under a regular AmeriCorps grant (competitive, formula, and others, if created where grantees must identify their program's employee positions on a budget), are subject to the background check rules. So are the members, because they receive an education award from the Trust. Education Award Program (EAP) grants are not subject to the background checks because the minimal fixed level of federal assistance requires the grantee to pay for, outside of the grant, the great majority of program costs, including employee salaries. However, EAP grantees are encouraged to develop a prudent criminal history check policy appropriate to their program design and populations served.

It often takes a long time to get the results of a background check, so complete this task as soon as possible.

For more details on criminal history background checks, please review the information on the CNCS website: https://www.nationalservice.gov/CHCFAQs

9.4 National Sex Offender Public Website (NSOPW):

http://www.nsopw.gov This check must be **completed** on the member upon *application* to your program. This check must be completed and adjoudicated **before** 1) the member has access to a vulnerable population, 2) the member starts their term of service. The national registry must be used to complete this check (a state sex offender registry check is not sufficient)

9.5 State Criminal History Check

This check must be completed for the state that the individual will be serving in **AND** for the state the member declares residency (if different).

If using a State Repository this check must be *initiated* by the AmeriCorps Program upon enrollment or hiring of the individual into the program. *If the check is still being processed when the AmeriCorps Member starts serving, the Member must be accompanied at all times by an individual that has been cleared through the State Criminal Registry.*

If using Truescreen for state checks, the checks must be adjudicated **before** the member starts.

9.6 FBI Criminal History Check

This check must be completed for individuals (members and employees) who will have recurring access to vulnerable populations (children, persons age 60 or older, and/or individuals with disabilities).

If using the State Repository (Hawai'i Criminal Justice Data Center), this check must be *initiated* by the AmeriCorps Program upon enrollment or hiring of the individual into the program. *Accompaniment is not needed if the member has been cleared by the state criminal history check.*

If using Fieldprint for state checks, the checks must be adjudicated *before* the member starts.

9.7 Accompaniment

Your program and site must have a written policy that ensures members are accompanied while waiting for the NSCHC results. Accompaniment must be performed by someone cleared for access, and that person must have the member in sight at all times when in contact with vulnerable populations. Once the results of either the FBI or state repository check(s) (both, if applicable) are received, accompaniment may cease. During periods of required accompaniment, there must be signed documentation daily by the member and accompanier and be included in the member file. Document notice to site and member when accompaniment may cease (appropriate checks returned).

One possible way to document accompaniment is to indicate on the covered person's timesheet

- 1. who accompanied during the access,
- 2. on what dates and hours, and
- 3. have the person who performed the accompaniment incrementally sign off and attest to the accuracy of the documentation.

You should have policies and procedures that clearly describe your accompaniment guidelines and documentation procedures. The documentation should show the day, times, accompanier and individual accompanied.

9.8 Eligibility to Serve

An individual is ineligible to serve in an AmeriCorps Program if they: 1) refuse to consent to a State Criminal Registry or FBI Fingerprint Check, 2) make a false statement in connection with a Program's inquiry concerning the individual's criminal history, 3) is registered or required to be registered on a State Sex Offender Registry, 4) have been convicted of murder as defined and described in 18 U.S.C. § 1111.

9.9 Procedures

An AmeriCorps site must have procedures in place for soliciting, completing, and documenting both Criminal Background Checks. Procedures must include the following:

- 1. Verification of identity of the individual
- 2. Acquiring prior, written authorization to complete the State Criminal Registry Check (not required for the NSOPW check)
- 3. Documenting the individual's understanding that selection is contingent upon the review of both Criminal Background Checks
- 4. Providing reasonable opportunity for the individual to challenge the factual accuracy before action is taken
- 5. Providing safeguards to ensure confidentially
- 6. Ensuring individuals with pending State Criminal and/or FBI checks are accompanied by an individual who has been cleared through all appropriate checks while interacting with vulnerable populations
- 7. Maintaining all documentation

Requesting of alternate search protocol (ASP) when necessary

9.10 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. If an individual applies for a second (or later) term of service with a different program, a new check is required.

9.11 Fieldprint

To satisfy the fingerprint-based FBI check requirement for individuals in a covered position, programs are encouraged to use Fieldprint. To do so, AmeriCorps programs must navigate to www.fieldprintcncs.com, which is a specific website created for this purpose.

To begin, programs must establish accounts through Fieldprint's CNCS specific webpage by clicking "Set Up an Account": www.fieldprintcncs.com. Fieldprint can provide FBI checks on individuals that have applied to work or serve in positions that receive an education award from CNCS or a CNCS grant-funded living allowance, stipend or salary. Said a different way, programs may not use Fieldprint to conduct FBI checks on individuals that are not in covered positions, as such checks are not authorized by law. An alternative search procedure (ASP) is not required to use Fieldprint. Fieldprint also offers customer service for its web portal via a toll-free helpdesk that is available from 8 a.m. to 10 p.m. ET, Monday through Friday, at 877-614-4364 or customerservice@fieldprint.com

A. Fieldprint Checks

Fieldprint will provide a fingerprint FBI check with an adjudication recommendation for programs. In addition, the Fieldprint process will capture the following information:

- Individual's consent to perform checks
- o Individual's understanding that selection to serve/work is based on the NSCHC results
- o Individual is informed that they have an opportunity to challenge the factual accuracy of a results before action is taken to exclude the individual from the position

B. Fieldprint Process

- 1. Go to www.fieldprintCNCS.com and click on "Set Up an Account." This process includes completing forms, setting up account permissions and signing off on agreements.
- 2. In one-to-two business days, you will receive an email with more information, including your Fieldprint Code and information on logging into your client portal, where you can review the status and results of all your checks.
- 3. When you receive this email, save your Fieldprint Code somewhere easily accessible. You will need to provide it to any individuals you direct to Fieldprint for an FBI check. Follow the instructions to create your password and log in to the client portal. If the DUNS number you provided was not on Fieldprint's list of approved organizations, you will be notified at this stage.
- 4. Provide your Fingerprint Code to the applicant. The applicant will set up an account, complete information, sign off on agreements and set up a Livescan fingerprint appointment. The Fieldprint FAQ's detail the information the applicant will need to provide or bring.
- 5. The applicant will be fingerprinted at their Livescan appointment and will receive an email notification when the check is complete.
- 6. You will also receive an email when an individual's check is complete. In most cases, this should not take more than three business days. Log in to your client portal to see the results of the check. Neither CNCS nor Fieldprint can release specific criminal history information obtained from the FBI to programs. Instead, Fieldprint reviews the specific criminal history information against a set of criteria to generate one of two recommendations: Cleared or Not Cleared.
 - i. Cleared does not necessarily mean eligible. Similarly, Not Cleared does not necessarily mean ineligible. Organizations must use both recommendations in combination with other information obtained through the other required NSCHC components to make an informed choice before selecting an individual for work or service.
- 7. You can log into your client portal at any time to view the status of any individuals who have used your Fieldprint Code. Results will be available for you to print for three years from the date of the check. You may need to retain this information for longer than it is available in the client portal to comply with federal grant requirements. See 2 CFR 200.333 for more information on the retention of federal grant records.

C. Cleared Recommendation

A Cleared recommendation means that an individual's FBI criminal history record information did not contain an indication that the individual may have been convicted of murder or be required to register as a sex offender. However, it does not necessarily mean an individual is eligible for work or service. No single source of criminal history record information is comprehensive. You must, at a minimum, conduct all required steps in the NSCHC process before determining that someone is eligible for work or service.

D. Not Cleared Recommendation

If when the results are returned you see a *Not Cleared* recommendation. That means that the selecting organization needs more information before it can make a final determination as to the fitness of an applicant. It does not mean that an applicant is ineligible for work or service. Selecting organizations must provide applicants with a reasonable opportunity to review and challenge the factual accuracy of a result before taking any adverse action on the basis of a Not Cleared recommendation (45 CFR 2540.205(d)).

Individual applicants have the opportunity to challenge a Not Cleared recommendation. Steps for an individual applicant to challenge a recommendation are located at http://www.nationalservice.gov/FBIGuidance.

If an individual receives a Not Cleared recommendation and challenges those results, a selecting organization should take the following steps:

1. If an individual would like to challenge the results, the organization must provide at least 45 calendar days for an individual to challenge the factual accuracy of the results.

- 2. If an individual does not contact you to challenge the results, you may proceed with making your selection on the basis of the Not Cleared result and the results of your other screening mechanisms. You should not select someone who has received a Not Cleared recommendation for work or service unless they have satisfactorily challenged the results. If they do challenge the results, proceed to Step 3.
- 3. Work with applicants to discuss and document what may have caused them to receive a Not Cleared recommendation. The steps they will need to take will vary based on the specific reason they have obtained a Not Cleared recommendation, as described below. In most cases, they will need to obtain a new FBI check. You may choose to pay for this additional check (though you are not required to), and the cost of the additional check is an allowable grant cost. Go to http://www.nationalservice.gov/FBIGuidance for information on ways an applicant can obtain an FBI check, including their costs and turnaround times.
 - a. Applicants whose FBI criminal history record information contains erroneous information, including offenses that have been expunged, must demonstrate to your satisfaction that the record is erroneous. This may require them to present you with additional information, such as court documents, or to contact the agency that provided the erroneous information to correct the record. Instructions are available on the FBI's website at https://www.fbi.gov/services/cjis/identity-history-summary-checks. If you intend to select an individual that has gone through this process, maintain (1) dated copies of the Not Cleared recommendation, (2) the evidence you used in making your eligibility determination, and (3) a contemporaneously dated memo to the file documenting your determination of the individual's eligibility.
 - b. Applicants whose FBI criminal history record information contains a conviction for an offense that relates to sex offenses or neglect, cruelty, or endangerment that did not actually lead to a requirement to register as a sex offender must demonstrate to your satisfaction that they are not required to register as a sex offender. You may request any additional information necessary to verify their eligibility. If the individual was not required to register, selection is at your discretion. You may choose to disqualify an individual for a conviction, even if it did not render them ineligible. However, the process by which you will determine the kinds of offenses that would render someone ineligible must be documented in your policies and procedures and followed consistently, in accordance with all relevant federal and state laws and regulations. If you select an individual that has gone through this process, maintain (1) dated copies of the Not Cleared recommendation, (2) the evidence you used in making your eligibility determination, and (3) a contemporaneously dated memo to the file documenting your determination of the individual's eligibility.
 - c. Applicants whose FBI criminal history record information contains a charge for a potentially disqualifying offense that does not clearly indicate that the individual was not convicted must demonstrate to your satisfaction the final outcome of the case. You may request any additional information necessary to verify eligibility. If the individual was not convicted of murder and is not required to be registered as a sex offender, selection is at your discretion. If you select an individual that has gone through this process, maintain (1) dated copies of the Not Cleared recommendation, (2) the evidence you used in making your eligibility determination, and (3) a contemporaneously dated memo to the file documenting your determination of the individual's eligibility.
- 4. Whether an individual is fit to work or serve with a selecting organization is a matter of discretion for the selecting organization, even though an individual may otherwise be eligible. Selecting organizations have a right and a duty to exercise their discretion in a manner that promotes a safe and effective program, mindful of state and federal nondiscrimination laws. Any eligibility determination must be dated contemporaneously with the determination and must be maintained as a grant record.

9.12 Truescreen

To satisfy the State and NSOPW check requirements for individuals in a covered position, HCNCS AmeriCorps programs are encouraged to use Truescreen. Complete Truescreen checks for individuals in covered positions before the start of work or service are required. A complete Truescreen check is defined as a check that is adjudicated by the grantee. This means that a program staff person with the proper approvals must log into their Truescreen account and manually adjudicate prior to an individual beginning work or service. All individuals in covered positions may not begin work or service until the Truescreen checks are complete and adjudicated.

Use of Truescreen will provide NSOPW for all states and territories; however, **does not** provide state criminal history check information for the following states and territories:

| States | Territories |
|---------------|--------------------------|
| California | Guam |
| Delaware | Northern Mariana Islands |
| Louisiana | Puerto Rico |
| Nevada | |
| New Mexico | |
| Virginia | |
| Massachusetts | |
| Mississippi | |

Programs will not be required to get a check from an unavailable state/territory for individuals in a covered positions if they have

- 1) obtained an NSOPW check from Truescreen
- 2) obtained any required state checks that are available from Truescreen, and
- 3) conducted a fingerprint-based FBI check.

Example 1: One state check is not available from Truescreen

An individual in a covered position with recurring access to vulnerable populations will serve in California (state of service **is not** available from Truescreen) and is residing in Alabama at the time of application (state of residence **is** available from Truescreen). The grantee must conduct a Truescreen NSOPW check, a fingerprint-based FBI check, and a Truescreen Alabama state criminal history check. The grantee does not need California state criminal history check.

Example 2: Both state checks are not available from Truescreen

An individual in a covered position with recurring access to vulnerable populations will be serving in Virginia (state of service **is not** available from Truescreen) and is residing in Puerto Rico at the time of application (state/territory of residence **is not** available from Truescreen). The grantee must conduct a Truescreen NSOPW check and a fingerprint- based FBI check. No separate state and territory checks are required.

Example 3: All state checks are available from Truescreen

An individual in a covered position with recurring access to vulnerable populations will serve in Illinois (state of service **is** available from Truescreen) and is residing in Indiana at the time of application (state of residence **is** available from Truescreen). The grantee must conduct a Truescreen NSOPW check, a fingerprint-based FBI check, a Truescreen Illinois state criminal history check, and a Truescreen Indiana state criminal history check.

If you are having a technical issue, take a screenshot of the error message and send to Truescreen Help Desk.

Phone: 888-291-1369 ext. 2006 Email: CNCShelp@truescreen.com

A. Truescreen Checks

Programs may obtain NSOPW State and/or NSOPW checks with an adjudication recommendation from Truescreen. In addition to providing State and NSOPW checks, the Truescreen process will capture the following information:

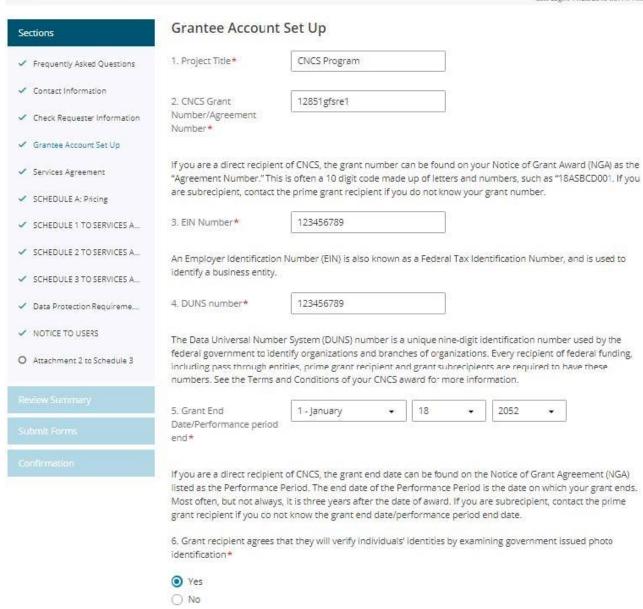
- A copy of the government issued photo ID
- Individual's consent to perform checks
- Individual's understanding that selection to serve/work is based on the NSCHC results

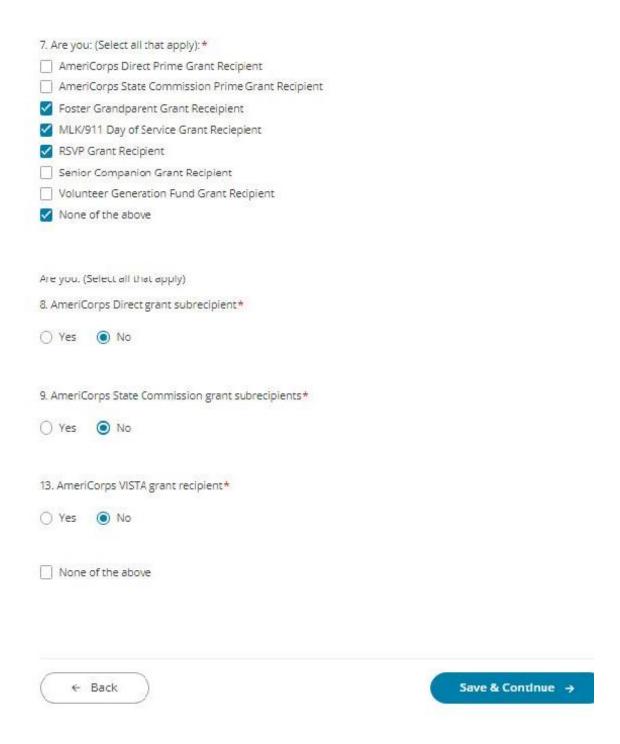
- Individual is informed of and given the ability to review challenge the factual accuracy of a result before action is taken to exclude the individual from the position, through Truescreen's Consumer Care Portal
- Anticipated start date
- State of residence at time of application
- States of service/employment
- Final program adjudication decision
- Timestamp documentation of Truescreen process steps

B. Truescreen Process

Truescreen provides an easy and simple process for programs to get state and NSOPW checks.

- 1. To create your account visit: https://applicationstation.truescreen.com
 - Select "Sign Up" to set up register an account, create login and password
 - When prompted please enter Agreement Code: CNCSAgreement
 - Once your credentials are established, go back to https://applicationstation.truescreen.com and "Log In" as a returning user.
 - When prompted please enter Agreement Code: CNCSAgreement
 - At some point during the account creation process, you will have to enter information in the fields like shown in the following two pictures. For questions 7, 8, 9, and 13, you should answer *None of the above, No, Yes, No,* respectively.





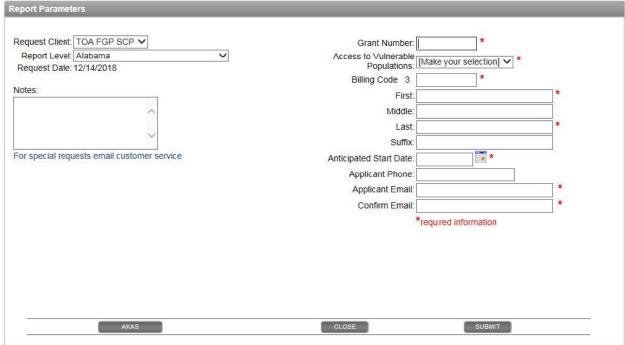
- 2. Sign back into ApplicationStation to complete the Agreement. You will be in ApplicationStation website once to create your account. This process includes completing forms, setting up account permissions and signing off on agreements. You will also be required to submit a letterhead and a signature for Action Letter and fax in credit card information. When creating your account please note that:
 - a. No edits within the agreement are allowed and each section must be completed in its entirety.
 - b. You may implement any date for the Permanent Resident Date.
 - c. Regarding user access, you can simply put any option on the agreement. Everyone will be set up exactly the same regarding access. All reports will be viewable for all users within the grantee organization.
 - d. Action Letters refer to the pre- and post-adverse letters that will be sent to the individual if they are denied the opportunity to serve. These letters will include your organization letterhead and

- signature. Truescreen will facilitate this denial process for you through their Consumer Care process.
- e. After you have completed the process, including submitting the billing and Action Letter information, it will take up to 5 business days to verify and create the account. Any delays in submitting the letter cover head and/or credit card information **will** result in delay in setting up your account.
- 3. After account set up, you will receive a series of four automated emails to set up your login and password for https://mytruescreen.com. This is for security purposes.
- 4. Truescreen will also reach out to you after your account is set up to introduce you to your account manager, provide information and offer training. **Please take the training!**
- 5. In https://mytruescreen.com, you will order state of service, state of residence and/or NSOPW checks. To order, you will provide the email of the applicant, the anticipated start date and whether the individual has access to vulnerable populations.

To initiate a report, go to the myRapid Requests module and click the myRapid Requests button. The ordering screen will open in a new window.



Enter the required information.

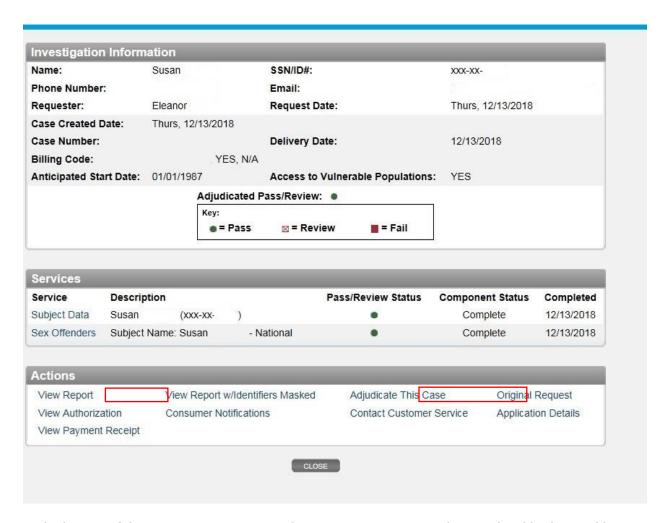


- Request Client: Organization Name
- Report Level: Levels available under the account
 - o State Only: Truescreen will only process a statewide search
 - o State + NSOPW: Truescreen will process the statewide and National Sex Offender search
 - o *NSOPW:* Truescreen will process the National Sex Offender Search Only
- **Grant Number:** Enter your grant number(s).
- Access to Vulnerable Populations: Yes/No Question
- Billing Code 3: If you want to differentiate between volunteer and staff or you can enter N/A.
- First Name of Applicant
- Last Name of Applicant
- Anticipated Start Date: Use the date the volunteer first started with the organization
- Applicant Email: Enter the volunteer's email address

After a check is ordered, an email will be automatically sent to the individual applicant to create an account and complete the criminal history check application. The applicant will need to provide their legal first and last name, address and residence since date, Social Security Number, date of birth, telephone number, email address, disclose convictions of murder and or/sex offenses that require registration, indication that they are a member, volunteer, or staff, and a legible copy of government issued photo identification. For more information go to, https://www.nationalservice.gov/sites/default/files/documents/NSCHC_Using_Fieldprint_and_Truescreen_11-15-18_508.pdf

- 6. The applicant will create an account and complete identification forms and sign off on agreements and disclosures.
 - a. The applicant will be required to submit a digital signature by using their mouse or finger on a touchscreen.
 - b. The applicant will need to upload a scanned copy or picture of a government issued photo identification.
 - c. The applicant has the opportunity to disclose murder and/or registerable sex offenses. If the applicant indicates that he or she has been convicted of these crimes under an alias, the grantee will be charged for an additional check under the alias name.
- 7. After the applicant application is complete, Truescreen will automatically run the checks and adjudicate any convictions according to CNCS eligibility criteria. Truescreen will notify you when the check is completed. The report will be available in your myNew Reports + module.

To view the report, click on the volunteer's name to bring up the following page:



At the bottom of the investigation screen, under Actions, you can view the completed background by clicking View Report (in the red box above).

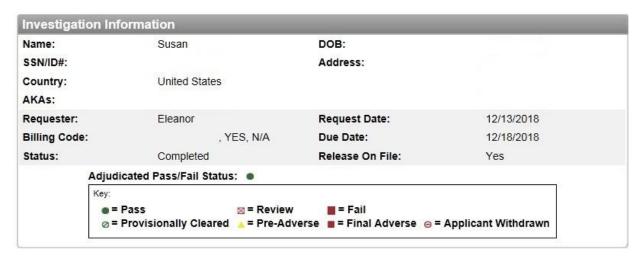
8. Truescreen will adjudicate convictions based off of CNCS eligibility criteria. However, programs will have access to individual applicant conviction data and will need to accept or reject the individual according to their screening criteria. Regardless of the Truescreen adjudication recommendation, the program must enter a final adjudication decision in their MyTruescreen account. If the program does not enter a final adjudication decision, the check is not complete, and if the applicant beings service/work, the check is noncompliant.

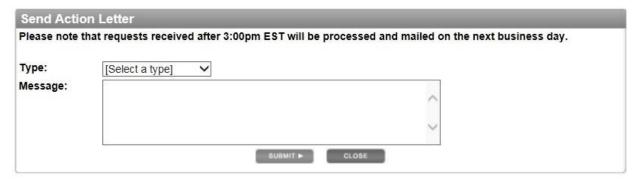
After viewing the report, you can adjudicate the case under Actions by clicking, "Adjudicate This Case". The Adjudication window will open, and you can adjudicate the case by selecting either *Pass* or *Pre-adverse*

- *Pass:* Everything reported back meets your organizations standards
- *Pre-adverse:* Something reported on the background check does not meet your organization's standards and the volunteer is unable to continue with your organization.
- 9. If a case is adjudicated to "Pre-adverse," you will also need to initiate the pre-adverse letter process. The Pre-adverse letter indicates to the member that information was found in their background report that does not match the organization's standards. To send the pre-adverse letter, under actions, click Consumer Notifications.



The following window will appear. From this window you will select the type of consumer notification letter you wish to send to the volunteer.



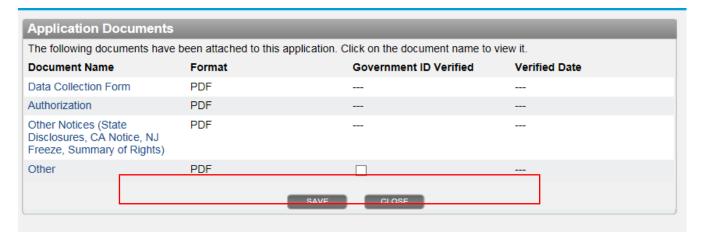


In the drop down menu, you can select *Pre-adverse letter*, and a notification will be sent to the member to log onto Truescreen's Consumer Care website to view the letter and their completed report. Once the Pre-adverse letter has been sent and viewed by the member, two things can happen:

- The member is free to submit a dispute to Truescreen Consumer Care. While under dispute, the
 background report and investigation information will be locked while Truescreen investigates the
 dispute. Once the dispute is completed, the report is redelivered for final review and to determine
 whether a final adverse letter should be sent. If a final adverse letter is needed, this request is also
 submitted from the Consumer Notifications window.
- If the volunteer does not submit a dispute after reviewing the pre-adverse letter and report, the final adverse letter is automatically sent five days later.

Sending a final adverse letter indicates to the volunteer that due to information reported, they can no longer volunteer for your organization.

10. Programs also need to document that they verified the individual's identity through government-issued photo identification (e.g. ID number, photocopies of ID, etc.). To validate the applicant's government-issued photo ID, you will go to the myAppStation tab, and specifically, the myOnline Applications module. Within this module, you can click on the member's application and a separate window will open. You will need to select the checkbox under Government ID Verified and click SUBMIT. Government-issued photo IDs will typically be stored and viewable by clicking *Other* like shown in the screenshot below.



Programs must abide by the Truescreen Pre-Approved ASP https://www.nationalservice.gov/CHCFAQs. If programs do not follow the Truescreen Pre-Approved ASP, the Truescreen check may be noncompliant and programs may incur a financial consequence.

9.13 National Fingerprint File States (NFF States)

EFFECTIVE FOR NSCHC CONDUCTED ON/AFTER SEPTEMBER 24, 2018:

The National Fingerprint File (NFF) is an electronic information sharing system maintained by the Federal Bureau of Investigation (FBI). The NFF allows the FBI and the States to exchange criminal history records for noncriminal justice purposes authorized by federal or state law, such as background checks for governmental licensing and employment.

States that participate in the NFF respond to record requests for all authorized noncriminal justice purposes and, as such, the FBI ceases to maintain duplicate criminal history data for these states. When a state participates in the NFF system, an FBI fingerprint check is duplicative of the search of a state's criminal history record repository. An FBI fingerprint check eliminates the need for grantees to conduct duplicative state criminal history record checks in states that participate in the NFF system.

Therefore:

- If a required state check is from a state that participates in the NFF, then the grantee does not need to conduct the check in that NFF state if they have conducted a fingerprint-based FBI check.
- If a required state check is from a state that does not participate in the NFF, then this pre-approved ASP is not applicable and the grantee must obtain the appropriate NSCHC state check(s).

The following states participate in the NFF program:

| The following occ | ices paradipate in the rii | . programm | | | |
|-------------------|----------------------------|------------|---------------|----------|--|
| Colorado | Florida | Georgia | Hawai'i | Idaho | |
| Iowa | Kansas | Maryland | Minnesota | Missouri | |
| Montana | North Carolina | New Jersey | New York | Ohio | |
| Oklahoma | Oregon | Tennessee | West Virginia | Wyoming | |

Example 1: One state participates in NFF

An individual in a covered position with recurring access to vulnerable populations will serve in Maine (state of service does not participate in NFF) and resides in Colorado at time of application (state of residence does participate in the NFF). The grantee must conduct an NSOPW check, a fingerprint-based FBI check, and a Maine state criminal history check. The grantee does not need a separate state of residence criminal history check from Colorado. The Colorado criminal history record information is included in the fingerprint-based FBI check.

Example 2: Both states participate in the NFF

An individual in a covered position with recurring access to vulnerable populations will serve in Ohio (state of service does participate in NFF) and resides in Iowa at time of application (state of residence does participate in the NFF). The grantee must conduct an NSOPW check and a fingerprint-based FBI check. No separate

state checks are required. Ohio and Iowa criminal history record information is already in the fingerprint-based FBI check.

Example 3: No states participate in the NFF

An individual in a covered position with recurring access to vulnerable populations will serve in Wisconsin (state of service does not participate in NFF) and resides in New Mexico at time of application (state of residence does not participate in the NFF). The grantee must conduct an NSOPW check, a fingerprint-based FBI check, a Wisconsin state criminal history check, and a New Mexico state criminal history check.

Note: For individuals in covered positions with no access, or episodic access, to vulnerable populations, the required checks are either 1) the NSOPW check and a fingerprint-based FBI check or 2) an NSOPW check and criminal history record checks in the State of service and the State of residence, as stated in 45 CFR 2540.203(a).

For more information on NSCHC go to: https://www.nationalservice.gov/resources/criminal-history-check

9.14 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.

9.15 National Service Criminal History Check Documentation

CNCS guidance states that the CNCS-contracted Truescreen service maintains documentation of search results for seven years and the CNCS-contracted Fieldprint service maintains records for three years. Programs must ensure that if the required records retention period for program records extends beyond the time periods Truescreen and Fieldprint retain records, that the actual, dated results of the criminal history checks are retained in separate and secure program files until the records retention period ends; results should not be kept with other AmeriCorps staff/member records. The actual printed and dated results of Hawai'i State Repository checks (if obtained) also must be retained securely, separate from other program files, for the required records retention period.

9.16 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.

9.17 Monitoring and Financial Impact of Failure to Comply

HCNCS monitors programs to ensure that members and staff are screened according to AmeriCorps regulations and the Serve America Act. Programs found out of compliance will be guided to take corrective action, immediately on discovery, to become compliant. Depending on a number of factors, HCNCS may disallow funds, based on CNCS New NSCHC Enforcement guidance, found at: https://www.nationalservice.gov/CHCEnforcement

The Final Rule posted in the Federal Register and the most current Frequently Asked Questions provide clear guidance and should be referenced in determining protocols. www.nationalservice.gov/resources/criminal-history-check

All programs should have a compliant policy and procedure for implementing the NSCHC properly. The policy and procedure must include compliant forms and processes.

Chapter 10 - Member Records

Perhaps the most critical administrative responsibility for Program Directors will be the maintenance of their AmeriCorps member files. These files are required by the Corporation to ensure compliance with statutory regulations such as eligibility to receive federal assistance. 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 HCNCS could recapture member costs from the program. Reference: (Terms and Conditions, 45 CFR 2522.820)

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 online as first step) | My AmeriCorps Portal (if using online application) or hard copy retained in member file Note: a resume can be retained in addition to an application, but cannot be used in lieu of an application | Prior to enrollment |
| Electronic National Service Enrollment Form | Member completes electronically in My AmeriCorps Portal | Prior to enrollment. The information from this form is used to initiate the automatic SSN and citizenship reviews. |
| Electronic National Service Exit Form and Verification of Member Hours | Member completes electronically in My AmeriCorps Portal | Online exit and entered in Portal within 30 days of member exit date. Approved hours verified on timesheets; hours rounded down to whole number when entered into Portal. |
| Member Citizenship Documentation | Hard copy member eligibility confirmation form | Before member start date and enrollment. |
| Member Citizenship Verification Documentation | 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 (or similar required in all member files) | Original hard copy in member file | Completed on or before the member's start date. |
| Member Documentation Checklist | Form can be found on Resources page of HCNCS website and in Basecamp | Should be completed for each member |
| Member Change of Status/Term | Changes approved by HCNCS and made in My AmeriCorps Portal and OnCorps | In Portal within 30 days of the member change of status |
| Member Service Locations | MyAmeriCorps Portal | Member service locations must be entered in the Portal within seven (7) days of members' starting a term of service (Terms and Conditions IV. F) |

| Member Timesheets | Electronically in OnCorps or other HCNCS approved method | Member timesheet submitted by the individual who supervises AC members. Due date established by the program |
|--|--|---|
| Member Agreement | 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 Agreement) in member file | To be provided to HCNCS upon request and included in the Member Agreement |
| 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) | Electronic or hard copy of complete results in separate & secure location | Completed on or before the individual's start date. See NSCHC section 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) | Supporting documentation in member file | Online exit and entered in Portal within 30 days of member exit date. Approved hours verified on timesheets; hours rounded down to whole number when entered into Portal. |
| Member Early Exit – Compelling Personal Circumstances (employment- welfare to work or in program design) | Approval from HCNCS prior to exit; supporting docs, including info. about employment, in member file | HCNCS approval prior to exit. Online exit within 30 days of member exit date. Approved hours verified on timesheets; 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, encouraged for TQT, and HT members) | Hard copy in member file | Near halfway point of service for 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. |
| Tax Forms | Hardcopy in member file or HR file | Prior to receiving a living allowance |
| Member Serious Injury or Death Report | Notify HCNCS Staff | Within 48 hours of injury during service or death. |

10.1 Enrollment Documents

The following documents should be maintained in the AmeriCorps member's file.

A. Member Application

Make sure you include the completed member application submitted to apply for the position. The Member Application should include the member's current physical address in which will be used to determine the member's state of residence at time of application and thus determines the NSCHC procedure https://www.nationalservice.gov/sites/default/files/documents/Final_Cleared_AC_Member_Application_Approved.pdf

B. AmeriCorps Enrollment Form

Member enrollment data must be entered into the My AmeriCorps Portal. eGrants is the access point to the Portal for program directors and this is the official system of record for the Corporation. Programs must have their members complete the enrollment and exit forms electronically through the MyAmeriCorps Portal.

C. SSN & Citizenship Requirement

To be eligible to serve as an AmeriCorps Members, an individual must satisfy the Citizenship Requirement. The following documents satisfy this requirement; a copy of at least one of these documents must be maintained in the member's file. Reference: Terms and Conditions - Specific IX.B and Regulations 45 CFR 2522.200

Primary documentation of status as a U.S. citizen or national:

- A birth certificate showing that the individual was born in one of the 50 states, the
- District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, American Samoa,
- or the Northern Mariana Islands;
- A United States passport;
- A report of birth abroad of a U.S. Citizen (FS-240) issued by the State Department;
- A certificate of birth-foreign service (FS 545) issued by the State Department;
- A certification of report of birth (DS-1350) issued by the State Department;
- A certificate of naturalization (Form N-550 or N-570) issued by the Immigration and Naturalization Service;
 or
- A certificate of citizenship (Form N-560 or N-561) issued by the Immigration and Naturalization Service.

Primary documentation of status as a lawful permanent resident alien of the United States:

- Permanent Resident Card, INS Form I-551;
- Alien Registration Receipt Card, INS Form I-551;
- A passport indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence; or
- A Departure Record (INS Form I–94) indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence.

Although the combination of obtaining a Driver's License or Government-Issued ID and Social Security Card are acceptable forms of identification for the I-9 Federal Employment Eligibility Form, these documents are not sufficient for proving United States Citizenship. An AmeriCorps Program must obtain a document from the list above regardless of the identification utilized to complete the I-9 Form. The I-9 Form is required for all individuals employed by your organization.

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).

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, and if a member is not able to be proven eligible, costs may be disallowed.

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.

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.

10.2 Eligibility Verification Form

The HCNCS AmeriCorps Member Eligibility Verification 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. The form can be found in the Resource Library on Basecamp. It is a required that this form (or a Program Specific form that contains at minimum the same information on the HCNCS Eligibility Verification 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. 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, HCNCS highly recommends that programs' members utilize the electronic enrollment process because it will give additional time to collect documentation, if needed.

10.3 Proof of Age

To be eligible for AmeriCorps State, a participant must be at least 17 years of age or be an out-of-school youth 16 years of age at the commencement of service and has not left school to join AmeriCorps. (Sec. 2522.200 of 45 CFR) The document that satisfies the Citizenship Requirement should be able to provide an age of the individual and therefore prove their age. If a member is under 18 at the time of enrollment, they must get parental consent to serve. Your organization must solicit parental consent for the member to serve before the member begins their term of service. The parental consent form must be maintained in the AmeriCorps member's file.

10.4 Educational Attainment Requirement

Because a great benefit of AmeriCorps is the Eli Segal Education Award, the Corporation has stipulated that all AmeriCorps members have a high school diploma or GED. (Sec. 2522.200 a.2 and Sec. 2522.200 b of 45 CFR) Members are also allowed to complete classes towards their GED during their year of service to satisfy this requirement. An AmeriCorps Member will not be eligible to utilize their Segal Education Award unless they have satisfied the Educational Attainment Requirement. Program Directors must verify that the Educational Attainment Requirement has been met before exiting a member with an award.

High School Diploma/GED – To verify whether a member meets the requirements relating to high-school education, each site must obtain a written declaration from the member that they have received their high school diploma or GED. It is strongly encouraged that programs obtain a copy of the member's diploma or GED and place it in their member file.

Signed Declaration – If a member does not have a copy of their GED or a high school diploma, the member must sign a declaration which states that the member has earned a GED or high school diploma OR will graduate high school or obtain a GED by end of the service term. The declaration must also include a projected date of completion and the stated penalty of loss of education award if the high school diploma or GED is not obtained.

10.5 National Service Criminal History Check Documentation

Please refer to Chapter 9: National Service Criminal History Check section on page 46 of this Handbook for this information.

10.6 Member Agreement

All members must be covered by a member agreement 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.

Any amendments to the member agreement 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 agreement.

A sample AmeriCorps Member Agreement can be found in the Resource Library of Basecamp.

A. Components of a Member Agreement:

- 1. <u>Member Position Description</u>: Verified to include no prohibited activities & indicating if member has recurring access to vulnerable populations (See <u>Member Activities & Compliant Position Descriptions</u> in section 11.3 on page 75 of this Handbook, Section 11.3 for more information.)
- 2. 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
- 3. Time frame members have to complete the required service hours
- 4. The amount of the education award being offered for successful completion of the term of service in which the individual is enrolling
- 5. Standards of conduct, with consequences, as developed by the program
- 6. Prohibited Activities, including those specified in the regulations at <u>45 CFR 2520.65</u> (see section <u>Prohibited Activities</u>)
- 7. The text of 45 CFR 2540.100(e)-(f), which relates to Non-duplication and Nondisplacement
- 8. The text of 45 CFR 2520.40-.45, which relates to fundraising by members;
- 9. Requirements under the Drug-Free Workplace Act (41 U.S.C. § 701 et seq. & 2 CFR 182)
- 10. Civil rights non-discrimination requirements, complaint procedures, & rights of beneficiaries
- 11. Suspension and termination rules
- 12. The specific terms under which a member may be released for cause
- 13. Grievance Procedures (see Grievance Policy section below)
- 14. If applicable, participation in GED/HSED preparation while in the program and requirement to obtain GED/HSED prior to using the education award
- 15. 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 quardian.
- 16. Program representative(s) signature along with date(s) of signature

B. Grievance Policy

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. Reference: (45 CFR 2540.230)

The grievance procedure must include opportunity for:

- 1. 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

2. Grievance Hearing

- a. Except for a grievance that alleges fraud or criminal activity, request must be made within one year after 98 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

3. 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

10.7 Tax Forms

The grantee must withhold Federal personal income taxes from member living allowances, requiring each member to complete a W-4 form at the beginning of the term of service and providing a W-2 form at the close of the tax year. The grantee must comply with any applicable state or local tax requirements.

For a copy of the W-4 form, visit: http://www.irs.gov/pub/irs-pdf/fw4.pdf.

10.8 Proof of Health Care Enrollment or Health Care Enrollment Waiver

(Only for FT members) All AmeriCorps Programs are *required* to provide Health Insurance to all full-time AmeriCorps Members or prove that the Member has their own Health Insurance during their full-time term of service. AmeriCorps Programs *must* maintain in the member's file whether they opted into the program's Health Insurance or if they waived it due to their own Health Insurance Enrollment. Additionally, Programs **must** place a copy of proof of enrollment (Health Insurance Card) in the member's file regardless of what type of Health Insurance they are enrolled in. AmeriCorps Programs are not required to provide Health Insurance to or prove Health Insurance Enrollment of less than full-time members (half-time, minimum-time, etc.) **unless** the Member is serving in a full-time capacity for at least a six week period. Programs may provide Health Insurance during that time period if they would like. (AmeriCorps Terms and Conditions VIII. D.)

Note: Please do not include the following in the Member's file:

- Medical condition information
- Disability disclosure and accommodation information
- These documents should be placed in a separate locked file cabinet/box along with other confidential information.

10.9 Child Care Benefit Enrollment Documents or Waiver of Benefit

In general, CNCS will provide for childcare payments, which will be administered through an outside contractor. Requirements and eligibility criteria are in the AmeriCorps regulations, 45 CFR § 2522.250. CNCS will not cover childcare costs for members who served on a less than full-time basis for a sustained period of time, or who have ceased serving or who are serving in a Professional Corps program. Programs may provide child care to less-than-full-time members serving in a full-time capacity, but they are not required to do so. Recipients that choose to provide childcare and will claim the costs of childcare as matching costs, as approved in their budget, may contact the childcare contractor for technical assistance. The criteria for member eligibility are contained in 45 CFR § 2522.250. Also see the FAQs,

http://www.nationalservice.gov/sites/default/files/upload/policy%20FAQs%207.31.14%20final%20working%20hy perlink.pdf for more detailed information on administering childcare and healthcare benefits.

If a member decides to utilize this benefit, the AmeriCorps Program must maintain all documentation in the member's file. All full-time AmeriCorps Members must sign a waiver of this benefit if they decide not to utilize this benefit. The waiver must also be maintained in the member's file. An application for Child Care can be found in Basecamp.

10.10 Photo/Media Release

Members must sign a photo/media release form (or include it in the Member Agreement) that will enable their pictures to be used in publications.

10.11 Time & Attendance

HCNCS 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. Members should enter descriptions for each individual day served.

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.

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

If programs would prefer to use their own timekeeping method, they must request permission from HCNCS staff.

Time sheets *must*:

- Be completed on OnCorps Reports (unless Program has a HCNCS approved alternate Time Keeping method)
- Separate time for direct service, training, and fundraising
- Separate lunch hours (lunch hours cannot be counted towards hours required for completion of the program)
- Be signed by both the AmeriCorps Member and their direct supervisor within a reasonable amount of time from the date of the service performed

10.12 Mid-Term and End-Term Performance Evaluation

All full-time and half-time AmeriCorps Members *must* be assessed at the mid-point of their term of service. AmeriCorps Programs may complete this evaluation for less than half-time members, but it is not required. This document must include the number of hours completed to date and how many hours the member has left to serve. Mid-Term Performance Evaluations are not required for members who exit before the mid-point of their terms, but an End-of-Term Performance Evaluation *must* be completed for these members.

10.13 Documentation of Member Discipline

In the event that you have disciplinary challenges with members, it is important to keep a paper trail of your challenges and corresponding attempts to correct the problems. An example of a progressive Disciplinary Action Plan is outlined on Page 27. Additionally, all Programs must maintain copies of 'Change of Status' forms from the eGrants Member Management System and document suspensions of service.

10.14 Exit Documents

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. 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 from their timesheets. The program will enter this number of approved hours in eGrants, rounded <u>down</u> 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.

A. 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.

B. 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).

C. 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.

D. 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.

10.15 End-of-Term Performance Evaluation/Exit Interview

All AmeriCorps Members must be assessed at the end of their term of service. End-of-Term Performance Evaluations must assess whether the member has completed the required number of hours, satisfactorily completed assignments, and has met other performance criteria that were clearly communicated at the beginning of the term of service. (Please see page 74 for a more detailed description of what is to be included in an End-of-Term Evaluation)

Chapter 11 - Member Training and Development

Training should be an ongoing part of your program, including:

- Training for assigned service activities including skills training (such as conducting organizational assessments, volunteer recruitment, volunteer project management and development), working with volunteers, cross-cultural sensitivity, and team building.
- Training to develop members which may include communication, conflict resolution, CPR/First Aid, "life after AmeriCorps," and other training topics.

Supervisors/Directors should also use service experiences to help members improve their skills, internalize project goals and increase their insight. Reference: Terms and Conditions, <u>45 CFR 2520.50</u>, and <u>2522.100</u> and https://www.nationalservice.gov/resources/americorps/nccc/member-training-and-development

11.1 Member Orientation

Member orientation should prepare members for their year of service. Orientation can help them acquire the skills and knowledge they need to "get the job done". A strong orientation will pay off in program outcomes, with members who know the purpose of their service and have the skills to accomplish program objectives.

Listed below are items the Corporation **mandates** to be covered in the orientation of members:

- Member rights and responsibilities
- Specific skills and knowledge to perform service
- Program's code of conduct
- Prohibited Activities
- Drug Free Workplace
- Suspension and Termination Rules
- Grievance Procedures
- Equal Opportunity, Affirmative Action, Non-Discrimination activities
- Sexual Harassment Awareness Education
- Introduction to National Service and AmeriCorps
- My AmeriCorps Portal

Listed below are items the Commission strongly encourages to be included in the orientation of members:

- The History of Service in America
- Host Sites
- · Program Rules, Regulations, and Benefits
- Member Handbook
- Benefits
- Allowed Activities (attachment)
- Living Allowance
- Staff and member roles
- Understanding the objectives of the program and how to collect data
- Have members fill out National Trust Enrollment Forms
- Eligibility of full time members for Health Care/Childcare

It is required that all AmeriCorps*State programs document that each member has received an orientation. Documentation includes:

- A copy of the orientation agenda(s)
- Signed confirmation by the members that have received an orientation

This information can be kept in each member's file or separately with program administration files.

Refer to this link for more guidance:

https://www.nationalservice.gov/resources/member-and-volunteer-development/encorps/elements-member-orientation

11.2 Life During and After AmeriCorps

Inclusive in Member Development is the holistic view of the Member. From recruitment and training, a program helps to guide and develop the AmeriCorps Members. Members that are young, including fresh out of college, are in need or more 'tools' than Members who have more life experiences.

Helping a Member understand the 'big picture' of where service will take them starts as early as recruitment and continues past their term of service. This includes career planning, use of the Segal education award, conflict resolution and time for reflection during their service. The AmeriCorps Alumni network is also a great asset for Members seeing like-minded individuals for guidance, friendship and possibly post AmeriCorps job hunting.

Refer to this link for more information:

https://www.nationalservice.gov/programs/americorps/current-members

11.3 Member Activities & Compliant Position Descriptions

Programs should use the following guidelines to ensure that member position descriptions accurately and adequately describe the allowable duties assigned to the member. Reference: Terms and Conditions - Specific V.A.

- Indicate any minimum qualifications for the position.
- Are specific to each member (unless members are performing the exact same activities).
- Do not contain the phrase, "other duties as assigned" or other vague statements about member responsibilities.
- Describe all member activities explicitly to ensure that prohibited activities are not included.
- 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."
- Avoid abbreviations or acronyms if used, spell out the term at the first usage and then use the acronym/abbreviation later in the document.
- 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."

11.4 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 Theory of Change, community needs, and/or 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.

11.5 Fundraising & Training

A. Member Fundraising

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.

B. Member Training

Members are required to receive certain trainings see (45 CFR 2520.50-55). 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.

11.6 Prohibited Service Activities

While charging time to the AmeriCorps Program, accumulating service, training hours, or performing activities supported by the AmeriCorps program or the Corporation, staff and members may not engage in the following activities, and the sub-grantee may not use grant funds (Corporation, HCNCS, or matching funds supporting staff or member time and effort) to support the following activities:

- a. Attempting to influence legislation;
- b. Organizing or engaging in protests, petitions, boycotts, or strikes;
- c. Assisting, promoting, or deterring union organizing;
- d. Impairing existing contracts for services or collective bargaining agreements;
- e. Engaging in partisan political activities, or other activities designed to influence the outcome of an election to any public office;
- f. 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;
- g. 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;
- h. Providing a direct benefit to
 - i. A business organized for profit;
 - ii. A labor union;
 - iii. A partisan political organization;
 - iv. A nonprofit organization that fails to comply with the restrictions contained in section 501(c)(3) of the Internal Revenue Code of 1986 related to engaging in political activities or substantial amount of lobbying except that nothing in these provisions shall be construed to prevent participants from engaging in advocacy activities undertaken at their own initiative; and
 - v. An organization engaged in the religious activities described in paragraph 3.g. above, unless CNCS assistance is not used to support those religious activities;
- i. Conducting a voter registration drive or using CNCS funds to conduct a voter registration drive;
- j. Providing abortion services or referrals for receipt of such services

Providing abortion services is limited to:

- i. Performing abortions.
- ii. Being present in the room during an abortion in support of the woman or the procedure.
- iii. Obtaining or providing medications to induce a medical abortion.

Referrals for abortion services is limited to:

- i. Scheduling or arranging for an abortion-related appointment, including any pre-procedure appointment required by law to obtain an abortion.
- ii. Providing or organizing transportation for patients to obtain an abortion when the AmeriCorps member or assigning staff member has actual prior knowledge that the purpose of the visit is to obtain an abortion.
- iii. Accompanying or providing translation services for patients obtaining an abortion.
- iv. Providing counseling or support before or during the procedure, including explaining what the procedure will be like, explaining what's required to obtain an abortion in a given state, explaining or obtaining signed abortion consent forms from clients interested in abortions, negotiating fees or insurance coverage for a particular abortion, or other activity that promotes or encourages an abortion.
- v. Providing information such as the name, address, website, telephone number, or other relevant factual information (such as whether the provider accepts Medicaid, etc.) about an abortion provider.
- vi. Promoting or encouraging use of abortion as a method of family planning.
- k. Such other activities as CNCS may prohibit.

AmeriCorps members may not engage in the above activities directly or indirectly by recruiting, training, or managing others for the primary purpose of engaging in one of the activities listed above. Individuals may exercise their rights as private citizens and may participate in the activities listed above on their initiative, on non-AmeriCorps time, and using non-CNCS funds. Individuals should not wear the AmeriCorps logo while doing so.

Other prohibited activities include (45 CFR 2520.40):

- Members raising funds for their living allowance
- Raising funds for program operating expenses or endowment
- Writing grant applications for CNCS grants, including AmeriCorps
- Writing grant applications for funding provided by other federal agencies
- 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.)

Reference: Terms and Conditions – Specific V.C and 45 CFR 2520.65

11.7 Rules of Conduct

Members are expected not to participate in the specified prohibited activities but are encouraged to abide by the program's rules of conduct, which may include:

- Demonstrating mutual respect toward others;
- Following supervisor directions and working on assignments in a reliable and conscientious manner;
- Keeping accurate and precise time records that are checked and signed by the site supervisor and forwarded to the local service site at the agreed upon time;
- Not engaging in any activity that involves proselytizing or assisting religious activities, influencing legislation
 or an election, aiding a partisan political organization, helping or, hindering union activity, or aiding a forprofit business;
- Not engaging in verbal or physical conduct which harasses, disrupts or interferes with another's performance or which creates an intimidating, offensive or hostile environment;
- Not engaging in conduct that sexually harasses others.

The AmeriCorps*State program must establish their own rules of conduct for all AmeriCorps Members to follow.

11.8 Member Time and Attendance

AmeriCorps Program Directors are responsible for verifying the accuracy of and signing the member time sheets The detailed time sheets are important because they:

- Help keep track of the member's time and ensures that they will complete the required number of hours to qualify for an Education Award;
- Distinguish between the member's hours (training, direct service, fundraising) to comply with all federal regulations;
- Document where the member's service is completed.

An AmeriCorps Program can utilize an Electronic Timekeeping System if the Program meets the following minimum requirements: (AmeriCorps FAQ C.7.)

- 1. The Program has established written policies establishing the use of electronic timekeeping systems as their system of record and this policy is submitted to HCNCS for approval,
- 2. The Program has a secure, verifiable electronic signature system that
 - a) identifies and authenticates a particular person as the source of the electronic signature,
 - b) indicates such person's approval of the information contained in the electronic message,
- 3. Once appropriate electronic signatures have been applied, no changes may be made unless there is a clear, auditable record of the revision.

Note: The use of regular e-mail to communicate approval is not a secure, verifiable electronic signature system.

11.9 Quality Supervision and Mentorship

AmeriCorps*State programs must provide opportunities for professional and personal development for each member as one of its goals. The member also provides an opportunity for your organization to build capacity and offer increased services in communities. Quality supervision and mentorship is critical in helping to maximize the benefits of service for the member and the organization. Remember to:

- Provide ongoing supervision through regularly scheduled meetings with your member(s).
- Focus on reviewing and developing service plans to achieve objectives;
- Maintain open communication with member(s); Identify and document training needs and opportunities for professional development for the member;
- Involve the member in appropriate staff meetings, retreats and training events;
- Provide direct and honest feedback on all aspects of the member's performance on a regular basis positive aspects as well as constructive criticism.

A. Service Objectives

Outlining service expectations with the AmeriCorps member, upon their arrival and revisiting those expectations at regular intervals, ensures that both of you have a clear understanding of what the member should accomplish over the course of the year. Objectives should focus on outcomes within the community which are clearly linked to service activities and the program's performance measures. The aim is for the member to have a true sense of ownership in their service plan for the year.

In order to facilitate the full understanding of member expectations:

- Review the specific responsibilities of his/her service year with the member;
- Establish goals and objectives for program success;
- Provide projects, tasks, and assignments throughout the year that allow the member to develop and exercise leadership:
- Communicate periodically with the member regarding the progress and attainment of goals and objectives;
- Revisit objectives periodically and revise them if necessary. Please be sure to keep the AmeriCorps Program Officer informed of any changes.

*Please note that service activities should NOT include clerical work, research, or fundraising unless such activities are directly related to the service project and do not exceed the percentage established by the Corporation. Regulations state that Fundraising Hours cannot exceed 10% of the member's total time; Training Hours cannot exceed 20% of the member's total time. (Sec. 2520.45 and 2520.50 of 45 CFR)

B. Disciplinary Action

While we hope that well-established objectives, ongoing supervision and periodic feedback will result in sound relationships between AmeriCorps Members and Program Directors, there may be times when more direct and documented feedback is required regarding conduct or performance. If a Program Director feels that he/she is experiencing an issue of conflict with a corps member, the Program Director should follow the Corporation-established grievance procedures listed in their member agreement.

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

C. Performance Evaluation

Supervisors play a crucial role in fostering a member's professional and personal development. As a manager and mentor, you have the ability to observe his/her performance and give feedback regarding what he/she does extremely well, skills he/she may want to develop further and what he/she might plan to do in the future. Given this critical role, HCNCS has the following expectations regarding appraisal of a member's performance:

- Evaluate the member mid-term and at the end of his or her agreed upon term of service. Use your own organization's appraisal form if it more accurately reflects the feedback process you have established with the member. A copy of both the mid-term and the end of term evaluations must be placed in the member's file. Both evaluations must be signed and dated by the member and the supervisor;
- The evaluation should provide a summary of the feedback given to the member over time and a summary of the member's service hours at the time of the evaluation. It should not contain any surprises.

D. Mid-Term Evaluations

Mid-Term Performance Evaluations are not required for members who exit before the mid-point of their service term, but an End-of-Term Performance Evaluation is required for all members.

E. End-of-Term Evaluations

Member End-of-Term Evaluations must include the following: Whether –

- The member completed the required number of hours making them eligible for an Education Award
- The member was released with compelling and personal circumstances making them eligible for an Education Award
- The member was released for cause making them ineligible for an Education Award
- A discussion on the member's ability to satisfactorily complete assignments
- A discussion on the member's ability to meet other performance criteria outlined in the member agreement As noted previously:
- Both a Mid-Term and an End-of-Term Performance Evaluation is required for all Full-Time and Half-Time members;
- Only an End-of-Term Performance Evaluation is required for less than Half-Time members;

F. Member Suspension Process

(National Policy FAQs, AmeriCorps Terms and Conditions)

- 1. Determine suspension to be the appropriate course of action
- 2. Suspend the member in OnCorps and eGrants
- 3. Document the suspension in the member's file
- 4. Make changes to the member's benefits when appropriate
 - a. Living allowance
 - i. Suspended members are not eligible to receive any living allowance payments while in suspension. – PD Handbook
 - ii. 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.
 - iii. Members who are suspended for minor disciplinary reasons may not receive a living allowance for the suspension period. FAQs

b. Health care

- i. Members who are suspended for disciplinary reasons are not eligible to receive health and child care benefits.
- ii. 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. FAO D.5

c. Child care

- i. 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.
- ii. 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:
 - 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)
 - The Member must intend to return to service:
 - Member must certify he/she needs the continued benefit in order to be able to return to service.

- iii. Program directors should contact the AmeriCorps child care providers on child care related changes, and their health insurance provider about health insurance related changes.
 - 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 to earn hours toward their term of service.

Reference: Member Leave or Suspension 45 CFR 2522.230, 2540.220, and 2540.230.

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.

Grievance

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

Compelling Personal Circumstances

Members may also be suspended temporarily for compelling personal circumstances, such as an accident or serious illness. 45 CFR 2522.230 states that compelling personal circumstances are those **beyond the participant's control**. It is up to the program to determine whether circumstances are personally compelling and to document this decision.

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.

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.

Terms of Service

Members should have a schedule that allows for sufficient accumulation of hours to satisfy the requirements to successfully complete service. The member and program may change the term of service, in writing, due to compelling personal circumstances. Regardless of changes in dates, members must complete the required hours -- not including vacation, holiday or sick days – to qualify for an Education Award. A maximum of 20% of the hours served may be spent on training, education, or other similar approved activities. A maximum of 10% of the hours served may be spent on fundraising on approved activities.

Travel time to and from activities does not count towards service, fundraising, or training hours. Additionally, each Full-Time member (and any other type of member working in a Full-Time capacity) must include a lunch break on their timesheets. Lunch breaks are not allowed to be counted toward service hours.

Extended Terms of Service - Compelling Personal Circumstances

The program may place a member on suspension and extend the member's term of service beyond one calendar year (to no longer than three additional months) due to the same compelling personal circumstances listed above.

If the member is placed on suspension due to compelling personal circumstances as described above, the member will cease to receive benefits including the stipend under the program. The member's new end-of-term date will be extended by the number of days the member was on leave. Once the member is reinstated, the member must begin receiving their stipend until completion of service.

G. Term Eligibility

An individual is no longer eligible to serve in AmeriCorps if they have reached the maximum term limit. Here is a list of the maximum number of terms in which an AmeriCorps member can serve in the three approved AmeriCorps programs.

- AmeriCorps State and National 4 terms
- AmeriCorps VISTA 5 full year terms
- AmeriCorps NCCC 2 terms
- For AmeriCorps State and National: each separate term is counted as one term, regardless of the minimum required hours; this includes terms for which a person received a pro-rated award
- For VISTA: each term is for one year; Summer Associate terms are not included in the 5-year limit
- For NCCC: each term is counted as one term, including terms for which a person received a pro-rated award

In addition to these limits on the number of terms that can be served, a member may receive no more than the aggregate value of two full-time education awards.

To be eligible for an additional year of service with AmeriCorps:

- 1. Members **must** receive satisfactory end of year performance reviews and have demonstrated an expanded scope of responsibilities at their site;
- 2. Funds must be made available through the Corporation for National and Community Service and HCNCS.

H. 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.

| Did the member serve through the contract end date? | Did the member meet the minimum hours requirement? | Did the member perform satisfac- torily? | Exit Type | Education Award Eligibility | Future Service Eligibility (Subject to Term Limits) | eGrants Exit Label |
|---|--|--|---|-----------------------------------|---|---|
| Υ | Y | Y | Successful Completion | Eligible for Full Award | Eligible | Earned a Award – Completed |
| Y | N | Y | Cause | Not Eligible for Award | Eligible- Must Disclose Prior Release for Cause | Did not Earn an Award – Ended Service Early |
| N | N | Y | Compelling Personal Circumstances | Eligible for Partial Award* | Eligible | Earned an Award – Ended Service Early |
| N | N | Y | Cause | Not Eligible for Award | Eligible- Must Disclose Prior Release for Cause | Did not Earn an Award – Ended Service Early |
| N | N | N | Cause | Not Eligible for Award | Not Eligible | Did not Earn an Award – Ended Service Early |

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

I. 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. 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).

Members must receive a final evaluation certifying that they meet the requirements for a successful exit with a full award. Programs 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.

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.

Early Termination for Compelling Personal Circumstances Reference: (AmeriCorps State and National Policy FAQs)

Compelling personal circumstances (exiting program for reasons other than employment)

Include those that are beyond the participant's control, such as, but not limited to:

- A participant's disability or serious illness;
- Disability, serious illness, or death of a participant's family member if this makes completing a term unreasonably difficult or impossible; or
- Conditions attributable to the program or otherwise unforeseeable and beyond the participant's control, such as a natural disaster, a strike, relocation of a spouse, or the nonrenewal or premature closing of a project or program, that make completing a term unreasonably difficult or impossible;
- Those that the Corporation, has for public policy reasons, determined as such, including:
 - Military service obligations;
 - Acceptance by a participant of an opportunity to make the transition from welfare to work; or
 - Acceptance of an employment opportunity by a participant serving in a program that includes in its approved objectives the promotion of employment among its participants.

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 prorated education award if they have served at least 15% of the service term, and the position is not available to be refilled.

A participant who is released for compelling personal circumstances and who completes at least 15 percent of the required term of service is eligible for a pro-rated Education Award. The member has the primary responsibility for demonstrating that compelling personal circumstances prevent the participant from completing the term of service. The program must document the basis for any determination that compelling personal circumstances prevent a participant from completing a term of service. (Sec. 2522.230 of 45 CFR)

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.

Compelling Personal Circumstances (exiting program for employment)

One type of exit for compelling personal circumstances that requires more documentation to be sent HCNCS is for member employment. 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 HCNCS Staff before granting a member a prorated award for a compelling circumstance related to employment. In considering a request, HCNCS Staff will review the following to determine if doing so is in the member and program's best interest:

- 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 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 agreement, or in an addendum to the member agreement. 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, this is not considered a compelling circumstance as the member is in control of their budget. The Program Director should consider whether the member might 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 HCNCS 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 be able to return to the same AmeriCorps position that he/she vacated. The Program Director may consider the individual for another vacant position:

- o If the member is still eligible for an additional term of service;
- o 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 HCNCS Program Officer.

J. Early Termination for Cause

"Cause" is defined as: violating the rules of conduct and or participating in the prohibited activities, dropping out of the program without obtaining a release, being charged with a violent felony or the sale or distribution of a controlled substance, or any other serious breach that in the judgment of the Program Director, would undermine the effectiveness of the program. Participants must disclose their release for cause on any subsequent applications to AmeriCorps programs.

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.

K. 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.

L. 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.

M. 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. HCNCS Staff 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.

Chapter 12 – Program Monitoring

12.1 Purpose of Program Monitoring

As stewards of public funding, HCNCS needs to ensure the programs they fund are aware of their contractual requirements and are in compliance with all of the rules, regulations, and provisions governing AmeriCorps funds. To accomplish this, the Commission staff must create adequate systems for monitoring programs.

First year programs will receive a site visit by their Program Officer during the start of their first grant cycle. In addition, first year programs will be considered high risk and will also have a monitoring review scheduled during their first year.

Programs with staff changes, i.e. Program Director, will also be considered high risk and will have a monitoring review scheduled during the first year with the new staff.

Other factors that may determine if your program is at high risk, include, but are not limited to, late reporting, not participating in mandatory calls, trainings, and serious issues that arise during the Program Year, etc.

12.3 On-Site Monitoring Visits

Based on a state or organization's risk-based monitoring strategy, a programmatic site visit may be made to every grantee or site one time per grant cycle, one time per year, or more often as may be appropriate. It is the goal of the Commission to complete monitoring visits to each program every year; however, this depends on staffing levels.

In most cases, on-site monitoring visits will be scheduled at least 30 days in advance. Your Program Officer will contact you to schedule the monitoring visit for your program.

On-Site visits by program staff can have many purposes, some of the most important are summarized in the table below:

| LEARNING | Finding out about AmeriCorps grantees'/sites' service activities and community partnerships. | | |
|-------------------------|---|--|--|
| PUBLICITY | Hearing success stories. | | |
| COMPLIANCE | Assuring that all federal, state, local, contractual, and organization-specific regulations, policies, and provisions are being followed. | | |
| MONITORING PROGRESS | Comparing actual outputs and outcomes to the performance measures outlined in a grantee/site contract. | | |
| TECHNICAL ASSISTANCE | To improve overall quality of the program. | | |

A. Preparation

To prepare properly for an on-site monitoring visit, your program staff should:

- Make certain appropriate staff will be available.
- Understand that Program Directors are not included in the Member interviews.
- Review the Documentation request provided by your Program Officer and be prepared to send the requested documentation electronically if asked.
- Make certain all required forms are in the Member files and preferably in the order listed on the Member Documentation Checklist or if in program specific order, make sure it is consistent.
- Verify that Member and Staff time sheets are up to date and signed/dated by the Member and their immediate supervisor (from their host site)

Typical on-site activities during the Monitoring Review include the following:

- Discussion with Program staff;
- Member File documentation compliance check (includes NSCHC Compliance);
- Financial compliance check;
- Policy & Procedures compliance check;
- Host site visit;
- Member interviews; and
- Possible Supervisor Interviews

B. Site Visit Monitoring Tool

During the on-site monitoring visit, HCNCS staff will use the AmeriCorps Site Visit Monitoring Tool, which includes the following sections:

Pre-Visit: Reporting and Communication Compliance and Early Issue Detection

Portions of the Monitoring Tool will be completed by HCNCS staff prior to the monitoring visit using information provided in eGrants. Results will be reviewed with the program and important issues or concerns will be discussed. Programs that are not performing in this area must show improvement and demonstrate a commitment to improving. Any concerns in this area will be addressed in the site visit feedback letter and a corrective action plan to improve future performance will be required.

Section 1: Program Administration and Management

All programs must be in compliance with all of the policies and procedures listed in Section 1 of the Monitoring Tool. Documentation and/or proof of compliance is necessary in case of an audit. Programs must have all documentation listed for this compliance check readily accessible to HCNCS staff during the monitoring review.

Section 2: Fiscal Review

The majority of this section will be completed with the assistance of the program's fiscal staff, but some questions will most likely be answered by program staff. Programs should have copies of their expenditure forms and the Federal Financial Reports submitted via OnCorps available for review.

For Cost-Reimbursement grants, HCNCS Staff will review at least five (5) transactions chosen randomly from line items in the PERs submitted in OnCorps.

At least two (2) travel vouchers with supporting documents will be reviewed. Additional travel vouchers will be requested for review if HCNCS staff finds thematic errors.

Section 3: Timesheet Review

At least two (2) member timesheets and at least two (2) staff timesheets will be reviewed. Additional timesheets will be requested for review if HCNCS staff finds thematic errors.

Section 4: Member File Compliance Review (includes NSCHC documentation review)

HCNCS staff will review at least ten percent (10%) or ten (10) Member Files, whichever is greater. If your program has 40 Members, at least 10 Member Files will be reviewed. If your program has 300 Members, at least 30 Member Files will be reviewed.

Member files are reviewed to determine if required documentation is being kept by the program. Proof of compliance is necessary in case of an audit. HCNCS will randomly select the Member files to be reviewed. All Member files reviewed must contain the required documentation preferably in the order listed on the Member File Review Sheet.

Section 5: Member Interviews

The monitoring team will interview Members during the visit. Program staff will not be involved in this interview, and responses will be kept confidential. A summary of the discussion will be made available with the rest of the monitoring report.

Section 6: Host Site Visit

If scheduling can be arranged, at least one Program Staff will accompany the monitoring team to visit one or more sites where members are serving.

C. Site-Visit Review Outcome

An AmeriCorps Program Review will be sent to the Program Director and/or designee by your Program Officer which may request additional documents. Programs will have 10 working days to respond with the requested documentation showing full compliance. Once the review is completed, the Program Officer will notify the Program Director and/or designee in writing that the monitoring review has been completed and all issues have been resolved. Copies of all completed forms and correspondence sent to the HCNCS Program Officer will be kept in the program file.

Programs that are not performing must show improvement and demonstrate a commitment to improving. Any concerns in this area will be addressed in the Program Review and a corrective action plan to improve future performance will be required.

D. High Risk Programs

Programs designated as high risk or who request a site visit to focus on specific issues may receive additional visits.

High risk factors may include, but are not limited to:

- A first year program
- A change in program director or other key staff
- Legitimate Member complaints to the Commission
- Poor past performance by the program (based on progress reports and/or previous site visits)
- Concerns regarding prohibited activities
- Compliance with reporting deadlines and Financial Compliance Issues

These visits will be conducted on an on-going basis throughout the program year. High Risk on-site visits may not be scheduled 30 days in advance. These visits will occur when issues are brought to the attention of the Program Officer. Commission staff will determine the need for a High risk on-site visit.

For program-related visits being conducted because of high risk factors, the agenda will be determined by the reason for the visit. For example, the agenda for a visit that is being held because of a change in program director will focus on expectations of programs, AmeriCorps regulations and relationship building. The agenda for a visit that is being conducted because of concerns regarding prohibited activities will focus on meeting with Members, site supervisors, and program staff to assess whether prohibited activities were taking place and to ensure that prohibited activities do not occur in the future.

A Program Review will be completed for each High Risk On-Site Visit.

12.2 Desk-Based Monitoring

While an on-site monitoring visit can provide a valuable, direct view of a program's operations, it is a resource-intense form of monitoring. Desk-based monitoring is more sparing of scarce resources of staff time and money and, properly used, can actually forestall the need for more intensive intervention later on to resolve grantee problems.

Throughout the year, your Program Officer manages each program in their portfolio. Areas that require your Program Officers attention include:

- Reviewing and approving performance measures
- Reviewing timeliness of reporting
- Reviewing program participation in required calls, trainings, service days & Recognition Day
- Reviewing each program/site's progress on Member recruitment and retention
- Tracking Member progress toward completing service hours
- Conducting Member enrollment gueries
- Review progress towards performance measures

Your Program Officer will also utilize OnCorps as an effective management and monitoring tool. For instance, through OnCorps, it is possible to:

- Review and approve monthly expense reports (PERs) Review and approve Aggregate Financial Reports (AFRs) Review Member timesheets
- Check timeliness of financial reports

Chapter 13 – Program Close-Out

The Corporation grants are usually awarded for a three (3) year Project Period, consisting of three (3) yearly budget periods. The Hawai'i Commission is required to submit documentation of program close-outs to the Corporation.

The following Final Close-Out reports are due to your Program Officer within 60 days after the close of your 3 year grant cycle. (Close out begins once all of your Members have completed their term of service.)

13.1 Final Project Report

The narrative should include a summary (no longer than 3 pages) of the qualitative accomplishments that the AmeriCorps grant has made for the duration of the grant period. Include a discussion of the impacts of any special initiatives that fall within this grant. Discuss what exists now in the communities that are served that did not exist prior to this grant. Quantitative data may be used to support the impact statements.

This report is to be e-mailed to your Program Officer and not submitted via eGrants or OnCorps.

13.2 Equipment and Supply Inventory Form

A program completing the final year of its three-year grant cycle must submit two (2) inventory forms. One for any equipment inventory with a current fair market value of \$5,000 or more purchased with federal grant funds. The second form for unused/residual supplies inventory purchased with federal funds exceeding \$5,000. Reports should be completed on the required forms. If no equipment or supplies were purchased, forms should reflect such. The forms can be found at the following links:

- Equipment Inventory Form: https://www.nationalservice.gov/sites/default/files/documents/cncs_equip_inventory_0.pdf
- Inventory of Residual Supplies Form: https://www.nationalservice.gov/sites/default/files/documents/cncs_residual_inventory_0.pdf

13.3 File and Record Retention

All files and documentation related to any programs funded by HCNCS must be retained by the program for at least three (3) years from the date of the termination of the grant or the date the final Federal Financial Report (FFR) is submitted to HCNCS, whichever is later.

If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the 3-year period, the records must be retained on site until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.

Programs must make responsible efforts to protect the confidentiality of disposed program records in such a way as to protect the identity and privacy of program participants.