RSVP Operations Handbook

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Corporation for NATIONAL & COMMUNITY SERVICE

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Preface

The Corporation for National and Community Service (CNCS) is an independent, federal grant-making government agency whose mission is to improve lives, strengthen communities, and foster civic participation through service and volunteering. For almost 20 years, CNCS—through its programs: Senior Corps, AmeriCorps, Volunteer Generation Fund (VGF), and Social Innovation Fund (SIF)—has helped to engage millions of citizens in meeting community and national challenges through service and volunteer action. CNCS provides grants to national and local nonprofits, schools, government agencies, faith-based and other community organizations and other groups committed to strengthening their communities through volunteering.

This RSVP Operations Handbook (Handbook) provides ideas and suggestions for effective practices in operating and managing many aspects of local RSVP projects. It is a technical assistance document and not a compliance guide. Many of the suggestions refer to specific sections of the federal regulations that govern RSVP, but the Handbook does not address all issues covered in the regulations. Sponsors and project directors are required to follow the RSVP Federal Regulations, published in Title 45, Chapter XXV, Part 2553, of the Code of Federal Regulations (CFR). Sponsors and project directors with concerns or questions with respect to compliance should first consult the federal regulations, the terms and conditions of the grant award, and, if necessary, contact the appropriate CNCS State Office.

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Upon request, this material will be made available in alternative formats for people with disabilities.

1 INTRODUCTION AND OVERVIEW

1.1 PURPOSE OF HANDBOOK

This Handbook has been developed for the use of sponsors of RSVP (Retired and Senior Volunteer Program) projects, including executive directors or their designees, RSVP project directors and other project staff, RSVP advisory council members, and others involved in managing local projects.

For further guidance on fiscal, programmatic, budgetary, and administrative matters, sponsors and project directors should consult the RSVP Program Regulations, the Terms and Conditions of the sponsor's Notice of Grant Award (NGA), or their CNCS State Office.

If there is a conflict between the contents of this Handbook and the federal regulations or the Terms and Conditions of the NGA, the regulations governing the grant or the Terms and Conditions of the NGA are the controlling authority.

1.2 HANDBOOK DESIGN

The Handbook is organized into a series of chapters that are designed to provide RSVP sponsors and project staff with ideas and suggestions for operating their RSVP projects. At the end of many of the chapters, a series of *Effective Practices* is presented that may help a sponsor implement a program locally. It is expected that sponsors and project directors will use these ideas to stimulate their own creative thinking and adapt the suggestions to meet their own local needs.

Further, many parts of the Handbook refer to specific sections of the regulations that govern RSVP in the RSVP Program Regulations, but the Handbook in no way replaces these regulations. Sponsors who want to clarify official policies should refer to the Terms and Conditions listed in the Notice of Grant Award (NGA) and any official policy guidance issued by CNCS.

This handbook will be updated periodically. Suggestions for revisions should be directed to SeniorCorpsHandbooks@cns.gov.

1.3 CNCS OVERVIEW

In 1993, the Corporation for National and Community Service (CNCS) was established under the National and Community Service Trust Act of 1993 to connect Americans of all ages and backgrounds with opportunities to give back to their communities and their nation. It merged the work and staffs of two predecessor agencies, ACTION and the Commission on National and Community Service.

At its inception, CNCS was directed to manage three main programs:

The newly created Senior Corps**,** which incorporated the longstanding Foster Grandparents, RSVP and Senior Companions programs;

The newly created AmeriCorps, which incorporated the longstanding VISTA program, the new National Civilian Community Corps program, and the full-time demonstration program that had

been established under the National and Community Service Act of 1990; and Learn and Serve America, formerly known as Serve America.

Today CNCS serves more than 5 million individuals of all ages and backgrounds help meet local needs through a wide array of service opportunities. These include projects in six priority areas: disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families through CNCS's core programs: AmeriCorps, Senior Corps, and the Social Innovation Fund.

CNCS is part of our nation's history of commitment to building a culture of citizenship, service, and responsibility. For more information on the history of CNCS see the National Service Timeline. See **Appendix 20** for common acronyms.

1.3.1 CNCS STRATEGIC PLAN

The CNCS Strategic Plan provides a roadmap for using national service to address critical challenges facing our communities and our nation. It builds on the strong foundation of national service that has developed over the past decades and the vision set forth in the bipartisan Edward M. Kennedy Serve America Act of 2009. CNCS's five-year Strategic Plan leverages the strength of grantees, participants, programs, state service commissions and the American public to build a network of programs that offer effective solutions in the six priority areas: Disaster Services, Economic Opportunity, Education, Environmental Stewardship, Healthy Futures, and Veterans and Military Families. Detailed information on the current Strategic Plan can be found on the CNCS website.

1.3.2 SENIOR CORPS

Each year Senior Corps taps the skills, talents, and experience of persons age 55 and older to meet a wide range of community challenges through three programs: RSVP, the Foster Grandparent program, and the Senior Companion program. RSVP volunteers recruit and manage other volunteers, participate in environmental projects, mentor and tutor children, deliver meals to the homebound and respond to natural disasters, among many other activities. Foster Grandparents serve one-on-one as tutors and mentors to young people with special or exceptional needs. Senior Companions help adults maintain independence in their homes.

Through grants and other resources—including the energy and efforts of citizens age 55 and over—Senior Corps helps meet the needs and challenges of America's communities.

- *RSVP*

  Since 1971, RSVP, one of the largest volunteer efforts in the nation for people 55 and over, has matched older adults who are willing to help with local organizations on the front lines of meeting community needs. RSVP projects link the skills of the volunteers with the identified needs of the community. RSVP volunteers do not receive any monetary incentive or stipend, but the RSVP project may reimburse volunteers for certain out-of-pocket costs associated with their service activities. In addition, RSVP volunteers receive accident, personal liability, and excess automobile insurance as well as community recognition.

- *Foster Grandparent Program*

Since 1965, the Foster Grandparent program has provided one-on-one mentoring, nurturing, and support to children with special or exceptional needs, or who are in academic, social, or financial disadvantage. Foster Grandparents serve from 15 to 40 hours a week and receive hourly stipends. Foster Grandparents must be age 55 or older and meet established income eligibility guidelines. In addition to the stipend, they receive accident, personal liability, and excess automobile insurance; assistance with the cost of transportation; an annual physical examination; recognition; and, as feasible, meals during their assignments.

- *Senior Companion Program*

Since 1974, Senior Companions have made a difference by providing assistance and friendship to adults who have difficulty with daily living tasks, such as shopping or paying bills. Their assistance helps these adults retain their dignity and remain independent in their homes rather than having to move to more costly institutional care. Senior Companions serve from 15 to 40 hours a week and receive hourly stipends. They must be age 55 or older and meet established income eligibility guidelines. In addition to the stipend, they receive accident, personal liability, excess automobile insurance coverage; assistance with the cost of transportation; an annual physical examination; recognition; and, as feasible, meals during their assignments.

1.3.3 RSVP: Purpose and Goals

- *Purpose*

Under the authority of the Domestic Volunteer Service Act, CNCS provides grants to qualified agencies and organizations for the dual purpose of engaging persons 55 and older in volunteer service to meet critical community needs; and to provide a high quality experience that will enrich the lives of volunteers.

- *Goals*

RSVP promotes the engagement of older persons as community resources in planning for community improvement and in delivery of volunteer services. Achievement of RSVP's purpose is facilitated by the coordination of the resources of CNCS, the RSVP sponsor, and the community to fulfill the following goals of RSVP:

1) Develop a variety of opportunities for community service for older people willing to share their experience, abilities, and skills for the betterment of their community and themselves.
2) Ensure that volunteer assignments are consistent with the interests and abilities of the volunteers and the needs of the community served.
3) Ensure that volunteers are provided needed orientation, in-service instruction, individual support and supervision, and recognition for their volunteer service.
4) Provide reasonable opportunity for community and volunteer involvement and support in development, operation, and appraisal of the RSVP project.
5) Develop local support to supplement available federal sources and ensure that program expenditures are incurred at the lowest possible cost consistent with the effective operation of the project, as required by CNCS's legislation.
6) Cooperate with agencies and organizations involved in the fields of aging and volunteerism.

7) Develop a sound, locally controlled senior volunteer program with continuing community support.

1.3.4 HISTORY OF RSVP

RSVP is an outgrowth of efforts by private groups, gerontologists, and government agencies over the past decades to address the needs of retired persons in America. In 1961, the White House Conference on Aging called attention to the continuing need of older people for useful activity. One of the outcomes of the Conference was the passage of the Older Americans Act of 1965. In that same year, the Community Service Society of New York launched a pilot project on Staten Island which involved a small group of older adults in volunteer service to their communities. This pilot project, named SERVE (Serve and Enrich Retirement by Volunteer Experience) was the precursor to the Retired Senior Volunteer Program (RSVP). The success of this project, which demonstrated beyond doubt the value of the services of older volunteers, led to an amendment to the Older Americans Act, creating RSVP in 1969.

RSVP was launched in the spring of 1971 with an appropriation of $500,000 under the auspices of the Administration on Aging (AoA). In July of the same year, RSVP was transferred from AoA to the federal agency, ACTION, which had oversight of federal domestic volunteer programs. Eleven projects were started in the summer of 1971.

The initial success of RSVP caused Congress to increase the appropriation to $15,000,000 in 1972. To expand RSVP nationally, a national conference of State Executives on Aging was sponsored by ACTION to solicit their ideas and assistance in developing RSVP projects within their states. Subsequently, the State Agencies on Aging received development grants from ACTION for a two-year period to assist communities to develop grant proposals for local RSVP projects. Under these grants, the state agencies employed RSVP Resource Specialists to provide expertise in community and program development.

In the first half of calendar year 1973, ACTION was gradually decentralized. Program and fiscal responsibility for all RSVP projects was given to the ten ACTION regional offices. This process occurred concurrently with growth of the program to a total of 590 RSVP projects by June 30. It was accomplished with the cooperation and assistance of State Agencies on Aging whose RSVP resource specialists had worked closely with ACTION's national, regional, and State Office staffs.

The period of greatest growth for RSVP occurred in the years 1972 through 1974. By June 30, 1974, there were 666 projects nationwide operating on a federal appropriation of $15,000,000. In 1988, RSVP had grown to 750 projects supported by federal funding of almost $30,000,000. In addition, there were six RSVP projects entirely supported by non-federal funds. Approximately 400,000 senior volunteers served in 1988. Non-federal support had grown to $27,100,000 at the end of 1987--$14,700,000 from state and local governments and $12,400,000 from the private sector.

Initially, RSVP was authorized in 1969 under Title VI, Part A, of the Older Americans Act, as amended. Following the transfer of RSVP to ACTION, Public Law 93-113, the Domestic Volunteer Service Act of 1973, was enacted on October 1, 1973. RSVP operates under Title II, Part A, Section 201, of this Act, as amended.

In 1993, the National and Community Service Trust Act of 1993 created the Corporation for National and Community Service. This new Act also lowered the age for participation in RSVP from 60 to 55 and eliminated a requirement that volunteers no longer be in the work force, resulting in the name change from Retired Senior Volunteer Program to Retired "and" Senior Volunteer Program to reflect that not all volunteers were retired.

Congress stated its expectations for CNCS through a statement of purpose (42 U.S.C. 12501) that, in part, included using national and volunteer service by Americans of all ages to:

1) Meet the unmet human, educational, environmental, and public safety needs of the United States without displacing existing vendors;
2) Renew the ethic of civic responsibility and the spirit of community throughout the United States;
3) Expand and strengthen existing service programs with demonstrated experience in providing structured service opportunities with visible benefits to the participants and the community; and
4) Provide tangible benefits to the communities in which national service is performed.

On April 21, 2009, President Barack Obama signed the Edward M. Kennedy Serve America Act, which reauthorized and expanded national service programs administered by the Corporation for National and Community Service. As part of the new legislation, competition was introduced for RSVP grants.

1.3.5 AMERICORPS

Since its founding in 1994, AmeriCorps engages Americans in intensive service at nonprofits, schools, public agencies, and community and faith-based groups across the country tackling pressing problems and mobilizing millions of volunteers for the organizations they serve through three programs: AmeriCorps State and National , AmeriCorps VISTA, and AmeriCorps NCCC (National Civilian Community Corps). AmeriCorps members recruit, train, and supervise community volunteers, tutor and mentor youth, build affordable housing, teach computer skills, clean parks and streams, run after-school programs, help communities respond to disasters, and build the capacity of nonprofit groups to become self-sustaining, among many other activities. In exchange for a term of service, members earn a living allowance and a Segal AmeriCorps Education Award that can be used to pay for college or graduate school, or to pay back qualified student loans.

1.3.6 SOCIAL INNOVATION FUND

Authorized by the Edward M. Kennedy Serve America Act in April of 2009, the Social Innovation Fund is a program of CNCS that empowers organizations to identify and support sustainable solutions that are already making a significant impact in transforming communities.

With the simple but vital goal of finding what works, and making it work for more people, the Social Innovation Fund and its' grantees create a learning network of organizations working to implement innovative and effective evidence-based solutions to local and national challenges in three priority areas: economic opportunity, healthy futures, and youth development.

1.4 RESOURCES OF CNCS

1.4.1 Office of the Inspector General (OIG)

The OIG is an independent and objective office established to help improve CNCS's programs and operations, including the Senior Corps. It has the responsibility of keeping the Corporation's CEO and the Congress informed about any problems and deficiencies relating to CNCS programs and operations. The OIG carries out this role by conducting and supervising audits and investigations that promote economy and efficiency, as well as prevent and detect fraud, waste, and abuse in CNCS's programs. The OIG also coordinates CNCS's relationship on these types of matters with other organizations, including Federal, state, and local law enforcement agencies.

When to Contact the OIG: The OIG should be promptly contacted whenever information is discovered that indicates that there has been waste, fraud, abuse, or any violation of criminal law at a program or at a sub-recipient.

Contacting the OIG

The OIG will accept confidential referrals of fraud, waste, and abuse in Senior Corps or other Corporation programs.

Written notifications should be submitted to:

Inspector General
Corporation for National and Community Service
250 E Street, SW, Washington, D.C. 20525

By Phone: (202) 606-9390 or the OIG toll-free Hotline: (800) 452-8210

Via email: hotline@cncsoig.gov

1.4.2 Office of External Affairs

1.4.2.1 Major Functions

The Office of External Affairs (OEA) coordinates communications, branding, and outreach and engagement efforts for CNCS and its programs. The staff works closely with other offices and departments to enhance and support efforts to reach out to external audiences.

Communications. OEA plans and executes strategic media relations (traditional and digital) and message management for CNCS, its programs, the CEO, and the Board of Directors; acts as its official spokespersons; writes speeches, blogs, and op-eds to promote national service accomplishments; conducts media training sessions for national service staff and participants; and advises programs on media relations; and manages GovDelivery email messages for the agency.

Outreach and Program Engagement. OEA plans and executes multi-media engagement for national service programs to support local and national recruitment and champions; produces materials to reach target audiences; and maintains and promotes the national service web site [www.nationalservice.gov] as a communication vehicle with programs, potential members, the media, and interested citizens.

Branding and Editorial Standards. OEA establishes and executes national service publishing priorities, sets and enforces editorial and design standards for print and digital materials, develops materials to meet the information and education needs of programs, and develops templates for branding and editorial consistency.

1.4.2.2 CNCS Websites

OEA, with support from other departments, maintains the CNCS website. NationalService.gov has pages dedicated to each of our programs and initiatives. For ease of discovery, you can reach these pages using the domain names SeniorCorps.gov and AmeriCorps.gov. The pages are designed to help customers, including program grantees and other stakeholders, get the information they need as easily and quickly as possible so they can focus their energies on serving community needs.

These sites recognize the power of the national service network through stories from service participants, news from the field, program spotlights and best practices. Other features include:

- Search function across all sites
- Phone directory of CNCS State Office staff
- Agency organizational chart
- Stories of service
- Latest news & blogs from the field
- Photo library
- Best practices
- Program spotlights
- Interactive guides for finding the "Right Program" (for organizations and individuals)
- Service calendar
- Forms library
- FAQs
- Connections to CNCS Social Media sites (Facebook/Twitter/YouTube)

Ordering Corporation Publications

Senior Corps projects can obtain OEA materials and publications through online ordering. Outreach materials and media kit materials are available on the national service website.

Program logos can be found on the CNCS logo webpage

Finding what you need on the CNCS websites:

Here are some of the most frequently asked questions from organizations working with or seeking to work with Senior Corps, with links to their answers:

- Where can I find out about CNCS funding opportunities?
  Funding Opportunities Webpage

- I'm having trouble using the electronic grants system. Where do I go for help?
  The eGrants Helpdesk / National Service Hotline

- Where can I find training and technical assistance information?
  The Knowledge Network
  Online Courses

- I am a current grantee. Where can I find Senior Corps grant application instructions and supporting materials?
  Managing Senior Corps Grants Webpage

- Where can I find the Terms and Conditions for my grant award?
  Terms and Conditions Webpage

- Where can I find information about required National Service Criminal History Checks?
  National Service Criminal History Checks

- Where can I find information about days of service?
  Special Initiatives

- Where can I find information about the changes in the OMB Circulars?
  Uniform Guidance

- I work for a faith-based organization. Are we eligible to apply for CNCS grants?
  Faith-Based and Neighborhood Partnerships

- I'm interested in promoting your programs to my organization's constituents. Where can I order brochures or other promotional materials?
  Outreach Resources
  Marketing and Media
  Senior Corps Branding Guidelines

- How do I find Senior Corps programs in my own community?
  National Service in Your State

- I'm a grantee and am looking for Senior Corps photos to use in our brochures. Where can I find them?
  Outreach Resources
  Marketing and Media
  Logos

- Where can I find resources for working with Veterans and Military Families?
  Veterans and Military Families

1.4.2.3 Partnerships and Program Support

OEA develops and manages partnerships and alliances that strengthen the impact and broaden the reach of national service. It is authorized to solicit and accept private donations which support CNCS programs and initiatives. Additionally, OEA takes the lead in producing many events connected to the agency's signature projects such as the Martin Luther King, Jr. Day of Service, Senior Corps Week, the September 11th National Day of Service and Remembrance, Mayor, County, and Tribal Recognition Day for National Service and AmeriCorps Week.

In 2015, the Office of External Affairs developed an annual engagement calendar that promotes monthly activities, events and media related to our programmatic focus areas and partnerships that make service and social innovation possible.

National and Community Service Initiatives

CNCS encourages participation in community-wide service activities. OEA works with CNCS programs to support both our signature projects such as MLK Day of Service, as well as other national service initiatives like the September 11th National Day of Service and Remembrance,

Mayor and County Recognition Day for National Service, Opening Day for National Service, Veterans Corps, and Senior Corps, AmeriCorps, and SIF Weeks. These annual national service activities provide opportunities to reach out to both traditional service partners and grantees and organizations with which projects might like to form new partnerships.

- Martin Luther King, Jr. Day is a day of service that reflects Dr. King's life and teaching-- bringing people together around a common bond of service to others. Responding to a 1994 Congressional charge, the Corporation engages Americans across the country to celebrate the King Holiday in a way that reflects his proposition that "everybody can be great because everybody can serve." National service grantees lead communities in making it a day on, not a day off and answering Dr. King's important question, "What are you doing for others?" In keeping with Dr. King's teachings, CNCS promotes service that leads to better economic justice for all. CNCS provides grants to support service projects that reflect Dr. King's life and teaching.
- Senior Corps Week is an annual recognition week designed to salute volunteers from Foster Grandparent, Senior Companion and RSVP programs, recognize community partners, and communicate the impact of and on the lives of those who serve and who are served. Senior Corps Week is the ideal time to promote the continuing contributions of older adults to communities.
- September 11th National Day of Service and Remembrance is the culmination of efforts originally launched in 2002 by the 9/11 nonprofit MyGoodDeed with wide support by the 9/11 community and leading national service organizations. This effort first established the inspiring tradition of engaging in charitable service on 9/11 as an annual and forward-looking tribute to the 9/11 victims, survivors, and those who rose up in service in response to the attacks.
- Mayor, County, and Tribal Recognition Day for National Service is an annual recognition where mayors, county, and tribal officials hold public events to highlight the value of national service to their cities and counties. This initiative is held in collaboration with the National League of Cities, National Association of Counties and Cities of Service.
- AmeriCorps Week is an annual recognition week designed to bring more Americans into service, thank AmeriCorps members and alumni for their powerful impact, and thank the community partners that help to make service possible. AmeriCorps Week is an ideal time to promote the depth and breadth of the national service family. In 2016, AmeriCorps will enroll its one millionth member.

Training and Technical Assistance

The Knowledge Network at is CNCS's "one-stop shopping" site for tools, training, and information about volunteering and national service. The Knowledge Network provides quick and easy access to training and technical assistance resources for national service programs.

Following is a summary of available features on the Knowledge Network:

- Senior Corps landing page

This landing page provides access to the most up-to-date training and technical assistance materials developed for FGP, SCP and RSVP programs.

- National Service Criminal History Checks

  Under the National and Community Service Act of 1990, as amended by the Serve America Act (SAA), all grantees must conduct National Service Criminal History Checks. Foster Grandparent and Senior Companion projects are required to conduct checks on participants and project employees. RSVP's are required to conduct checks on project employees. In addition, grantees are required to maintain specific documentation verifying successful completion and adjudication of criminal history checks.

  This landing page provides an exhaustive list of requirements, guidance and resources aimed at all CNCS programs including FGP, SCP and RSVP.

- Financial Management Resources

  Organizations need to handle funds wisely. This may include developing written policies and procedures, internal controls, and budget controls. CNCS grantees also need to be familiar with documenting in-kind donations, time and activity reporting, generally accepted accounting principles (GAAP), CNCS regulations, and OMB circulars. Some of our most relevant resources related to this topic can be found on this page.

- Performance Measurement

  CNCS' Performance Measurement framework provides a common focal point for CNCS's work across all programs and initiatives. CNCS has a focused set of agency-wide measures derived from the 2011-2015 Strategic Plan and each Senior Corps program contributes to them. This page provides access to common core curricula as well as to each program's specific measures, requirements, and associated resources.

CNCS Research and Evaluation

The Office of Research and Evaluation (R&E) advances the mission of CNCS by building knowledge about the effectiveness of national service, social innovation, civic engagement, and volunteering as solutions to community needs. R&E also works to improve the decision-making of CNCS, its grantees, and the field through the use of scientific research methods. This is accomplished by supporting CNCS grantees, offices, and programs in the measurement of performance and results, embedding evidence throughout the development and implementation of their work, and shaping key policy decisions using credible data.

Research efforts supported by R&E include:

- The Volunteering and Civic Life in America report is issued by CNCS and the National Conference on Citizenship and shows that service to others continues to be a priority for millions of Americans.

- Evidence Exchange: a digital repository of research, evaluation reports, and data focusing on national service, social innovation, civic engagement, and volunteering. The purpose of this

repository is to provide our grantees, our partners and, most importantly, communities across America easy access to this information. Senior Corps specific reports and reports on issues relevant to Senior Corps are available.

- Evaluation Resources: Evaluation is the use of social science research methods to assess a program's design, implementation, and effectiveness. It is a tool that helps programs continuously improve their work and demonstrate what they are accomplishing in communities. This page contains a number of resources to assist your program as it moves through each stage of the evaluation process.

The Electronic Grants System

The electronic grants system is an online system designed to automate the entire grants and project management process from application to closeout. It serves as the official system of record and maintains the Notice of Grant Awards which include the terms and conditions of the grant award.

Sponsors use the electronic grants system to:

- ✓ Submit and track grant applications including certifications and assurances, amendments, continuations and renewals
- ✓ Submit Federal Financial Reports, Project Progress Reports and other required reports

CNCS Program Officers use the electronic grants system to:

- ✓ Review applications and reports,
- ✓ Award and manage grants efficiently and effectively.

The electronic grants system Help Desk can be reached at:

Phone: 1-800-942-2677
Online: National Service Hotline.

1.4.3 The Federal Register

Senior Corps programs are governed by law and administrative rules or regulations. Making and amending government regulations is controlled by the White House's Office of Management and Budget. Notices of proposed regulations must be published in the Federal Register for public comment.

Published every Federal working day, the *Federal Register* is the official gazette of the United States Government. It provides legal notice of administrative rules and notices and Presidential documents in a comprehensive, uniform manner. Visit the Federal Register for free online access to its publications.

Code of Federal Regulations

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government. It is divided into 50 titles that represent broad subject areas of federal regulation. Each volume of the CFR annual edition is updated once each calendar year. The 50 subject matter titles

contain one or more individual volumes, which are updated once each calendar year, on a staggered

Each title is divided into chapters, which usually bear the name of the issuing agency. Each chapter is further subdivided into parts that cover specific regulatory areas. Large parts may be subdivided into subparts. All parts are organized in sections, and most citations in the CFR are provided at the section level (such as 45 CFR 2553.21). A list of agencies and where they appear in the CFR may be found in Appendix C of the U.S. Government Manual. CNCS is found in Title 45, Chapters XII and XXV. The regulations governing RSVP are in Chapter XXV, Part 2553, which is typically cited as "45 CFR 2553."

Electronic Code of Federal Regulations – the eCFR

The eCFR is a current, daily updated version of the Code of Federal Regulations (CFR).The eCFR is a convenient way to access the latest version of the regulations incorporating all amendments. Regulations cited in this Handbook are linked to the eCFR.

The online CFR or "eCFR" provides the public with enhanced access to Government information and is a convenient way to access the latest version of the program regulations incorporating all amendments. In the eCFR, amended sections are identified with the date of their publication and a reference to the volume of the Federal Register where they were published.

2 PROJECT OPERATIONS

2.1 ELIGIBILITY, AWARDS, AND SPONSORSHIP

2.1.1 Sponsor Eligibility

The CNCS awards federal RSVP grants to public agencies, Indian Tribes, and secular and faith-based private non-profit organizations in the United States, that have authority to accept and the capacity to administer RSVP projects.

2.1.2 Solicitation of Proposals

When federal RSVP grants are available CNCS conducts a grant competition. A Notice of Funds Availability (NOFA) is issued when funding for a grant competition has been appropriated by Congress (or a Notice of Funding Opportunities (NOFO) is issued when funding for a grant competition is anticipated but not yet available). The NOFA or NOFO may also be referred to as the "*Notice*" in application related instructions. Any eligible agency or organization may apply for an RSVP grant. Notices are posted at Grants.gov and at the Funding Opportunities on CNCS website NationalService.gov. Notices will be shared broadly through national and local networks.

2.1.3 Submission of a Grant Application

Grant applications are submitted in the CNCS electronic grants system. Applications are submitted following the *Notice* instructions and using the forms included with the *Invitation to Apply* and *Notice* on the Funding Opportunities webpage. The application must be submitted by a representative of the sponsor who is authorized by its governing body to certify that all data in the application are true and correct, the application has been duly authorized by the governing body of the applicant, and the applicant will comply with the Assurances submitted with the application, if the assistance is awarded. (See **Appendix 12** and **Appendix 13** to review the Assurances and Certifications.)

2.1.4 "Self-Sponsored" Projects

In some situations, project staff, advisory councils, boards, or other interested persons, have incorporated as an independent non-profit organization and successfully competed to become a sponsor. These so-called "self-sponsored" projects must meet all the administrative and programmatic requirements associated with sponsorship addressed in the program regulations. CNCS neither encourages nor discourages self-sponsorship, but recommends that groups considering this option fully explore the advantages and disadvantages applicable to their situation and consult with other organizations who have taken this step. Contact your CNCS State Office for further information.

2.2 SPONSOR RESPONSIBILITIES

2.2.1 Regulations Requirements

The sponsor is legally responsible for fulfilling all project management responsibilities necessary to accomplish the purposes of the program and may not delegate or contract these responsibilities to

another entity. Sponsor responsibilities are listed in 45 CFR 2553 Subpart B of the RSVP regulations. A few key responsibilities are listed here:

1) Focus RSVP resources on activities that will have a positive impact on critical human and social needs within the project service area, and in compliance with CNCS performance measure requirements.

2) Develop and manage a system of volunteer stations to provide a variety of placement opportunities that appeal to persons age 55 and over by:

    a) Ensuring that a volunteer station is a public agency, Indian Tribe, or non-profit private organization, whether secular or faith-based, or an eligible proprietary health care agency, that has the capacity to serve as a volunteer station. (Proprietary health care organizations are health care facilities that are privately owned and operated for profit. Refer to Chapter 6 for more information about volunteers at health care agencies and volunteer stations.)

    b) Ensuring the placement of RSVP volunteers is governed by a Memorandum of Understanding (MOU) between the sponsor and each volunteer station. (See *Preparation of the Memorandum of Understanding* in Chapter 6, for more information.)

    c) Annually assessing the placement of RSVP volunteers to ensure the safety of volunteers and their impact on meeting the needs of the community. CNCS does not have a required tool for the annual safety assessment (See **Appendix 8**). Grantees can use checklists, questionnaires, email assurances, or other documentation that enables them to meet the requirement. The annual documentation is in addition to the safety clause in the MOU. The safety clause in the MOU, while a critical element, is not an assessment nor does it have an annual requirement; and general observations while on a site visit do not constitute an assessment.

    d) Comply with and ensure that all volunteer stations comply with all applicable civil rights laws and regulations, including providing reasonable accommodation, where appropriate, to qualified individuals with disabilities to serve or participate in the RSVP project. (See **Appendix 15**, *Primer on Civil Rights Compliance*.)

3) Make special efforts to recruit and place into RSVP volunteer service individuals from diverse races, ethnicities, sexual orientations, or degrees of English language proficiency, Veterans and military family members, persons with disabilities, and hard-to-reach populations and groups in the community which are underrepresented in the project. The sponsor should stress the recruitment and enrollment of persons not already volunteering.

4) Provide RSVP volunteers with cost reimbursements specified in 45 CFR 2553.43, as well as recognition of their service.

5) Secure community participation in local project operation by establishing an advisory council. (See Chapter 4, *Community Participation*, for additional information.)

6) Develop, and annually update, a plan for promoting service by older adults within the project service area. 45 CFR 2552.23(f) Suggested elements of such a plan include:

    a) Communicating the importance of the project to the sponsor's board, the advisory council, staff, and volunteers;

    b) Ensuring that the project has adequate administrative and fiscal support;

    c) Playing an active role in promoting the project and its contributions to the community; and

    d) Meeting regularly with media, political leaders, funders, civic groups, and others to promote awareness of and support for the project.

7) Provide levels of staffing and resources appropriate to accomplish the purposes of the project and carry out its project management responsibilities.

    a) Employ a full-time project director (except as otherwise negotiated with CNCS) to accomplish program objectives and manage the functions and activities delegated to project staff for Senior Corps program(s) within its control. (See Chapter 5, *Project Staff*, for more information.)

    b) Establish record keeping and reporting systems in compliance with CNCS requirements that ensure quality of program and fiscal operations, facilitate timely and accurate submission of required reports, and cooperate with CNCS evaluation and data collection efforts.

    c) Conduct criminal history checks on all grant-funded staff, in accordance with the requirements in 45 CFR 2540.200–207.

    d) Ensure that appropriate liability insurance is maintained for owned, non-owned, or hired vehicles used in the project.

8) Ensure that the official sponsor and project information in CNCS electronic grants system is accurate, including the legal names of the sponsor organization and the project; the names of the sponsor's authorized representative and the project director; and their respective post office addresses, e-mail addresses, and phone numbers.

2.2.2 Fund Raising Limitations – Uniform Guidance

The sponsor assumes full responsibility for securing maximum and continuing community financial and in-kind support to operate the project successfully. Certain government-wide requirements apply to fund raising under RSVP grants.

Senior Corps sponsors must follow all applicable OMB Cost Principles, as stated in the Terms and Conditions of your grant award.

All RSVP grant awards are subject to the Uniform Administrative Requirements, OMB Cost Principles, and Audit Requirements for Federal Awards located at 2 CFR Part 200 and CNCS's implementing regulation at 2 CFR Part 2205 (hereinafter, the Uniform Guidance). Award recipients

must read, understand, and implement these requirements. See **Appendix 11** for Frequently Asked Questions.

2.2.3 Relinquishment

If an RSVP sponsor determines they are no longer able to administer the project they should contact their program officer as soon as possible. The program officer will work with the sponsor for an orderly relinquishment and close-out of the grant.

To begin the relinquishment process the sponsor will be asked to send a letter to their CNCS State Office formally giving notice of their decision to relinquish the grant and the effective date of the relinquishment. The CNCS program officer will forward the letter to the Director of Senior Corps and the project's grant officer. The program officer will provide the sponsor with template letters to send to volunteers, volunteer stations, and advisory council members. The program officer will set-up a meeting with the sponsor and grants officer to review the status of the grant funds for close-out. The project will be responsible to complete final project and financial reports.

2.2.4 Subsequent Requirements

The sponsor must also abide by any subsequent laws, Executive Orders, or relevant regulatory directives, including special conditions that may be prescribed for the project. The sponsor may establish additional policies not covered by, and not contradictory to, CNCS policies.

2.3 SPECIAL LIMITATIONS INCLUDING PROHIBITED ACTIVITIES

The following are special limitations including prohibited activities to which RSVP sponsors and projects are subject. Project sponsors are highly encouraged to have written policies in place to better ensure compliance with the list below. In the event of a question as to the application of the following limitations, contact the appropriate CNCS State Office.

2.3.1 Political Activities [**45 CFR 2553.91(a)** and **45 CFR 1226**]

1) No part of any grant may be used to finance, directly or indirectly, any activity to influence the outcome of any election to public office, or any voter registration activity.

2) No project may be conducted in a manner involving the use of funds; the provision of services, space, or facilities; or the employment or assignment of personnel in a manner that identifies the project with:

   a) Any partisan or nonpartisan political activity associated with a candidate, or contending faction or group, in an election; or

   b) Any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election; or

   c) Any voter registration activity except that voter registration applications and nonpartisan voter registration information may be made available to the public at the premises of the sponsor. But in making registration applications and nonpartisan voter registration information available, employees of the sponsor and volunteers may not express preferences or seek to influence decisions concerning any candidate, political party, election issue, or voting decision.

3) No RSVP volunteer or employee of a sponsor or volunteer station may take any action, when serving in such capacity, with respect to a partisan or nonpartisan political activity that would result in the identification or apparent identification of RSVP with such activity.

4) The sponsor may not use grant funds for any activity that inlfuences the passage or defeat of legislation or proposals by initiative petition. In other words, there is a prohibition against using RSVP grant funds for lobbying activities.

5) Prohibitions on Electoral and Lobbying Activities are fully set forth in 45 CFR 1226

2.3.2 Restrictions on State or Local Government Employees [**5 U.S.C. 1501, 1502 & 1503**]

If the sponsor is a state or local government agency with a grant from CNCS, certain restrictions contained in Chapter 15 of Title 5 of the United States Code are applicable to persons who are principally employed in activities associated with the project. The restrictions are not applicable to employees of educational or research institutions. Employees subject to these restrictions may not:

1) Use their official authority or influence for the purpose of interfering with or affecting the result of an election or nomination for office; or

2) Directly or indirectly coerce, attempt to coerce, command, or advise a state or local officer or employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes; or

3) Be a candidate for elective office, except in a nonpartisan election. ("Nonpartisan election" means an election in which none of the candidates is to be nominated or elected as representing a political party any of whose candidates for Presidential elector received votes in the last preceding election at which Presidential electors were selected.)

2.3.3 Religious Activities [**45 CFR 2553.91(g)**]

1) RSVP volunteers and project staff funded by CNCS may not give religious instruction, conduct worship services, or engage in any form of proselytization as part of their duties.

2) A sponsor or volunteer station may retain its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use CNCS funds to support any inherently religious activities, such as worship, religious instruction, or proselytization, as part of the programs or services funded. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under RSVP.

2.3.4 Non-Discrimination [**45 CFR 2553.91(f)**]

For purposes of this regulation, any program, project, or activity to which CNCS supported volunteers are assigned is deemed to be receiving federal financial assistance. (See **Appendix 15**, *Primer on Civil Rights Compliance,* for more information.)

1) A sponsor or sponsor employee may not discriminate against an RSVP volunteer, or with respect to any activity or program, on the basis of race; color; national origin, including limited English proficiency; sex; age; religion; or political affiliation; sexual orientation, or on the basis of disability, if the volunteer with a disability is qualified to serve.

2) Sponsors are encouraged to take affirmative action to overcome the effects of prior discrimination. Even in the absence of prior discrimination, a sponsor may take affirmative action to overcome conditions which resulted in limited participation.

2.3.5 Labor and Anti-Labor Activity [**45 CFR 2553.91(d)**]

No grant funds may be directly or indirectly used to finance labor or anti-labor organization or related activity.

2.3.6 Non-Displacement of Employed Workers and Non-Impairment of Contracts for Service [**45 CFR 2553.91(b)** and **45 CFR 1216**]

An RSVP volunteer may not perform any service or duty or engage in any activity which would otherwise be performed by an employed worker or which would supplant the hiring of or result in the displacement of employed workers, or impair existing contracts for service. See 45 CFR 1216.1.1 – 1216.1.4 Non Displacement of Employed Workers and Non-Impairment of Contracts for Service for the CNCS regulations on this subject. These regulations list certain exceptions.

2.3.7 Prohibition on Fee-for-Service [**45 CFR 2553.91(c)**]

Under no circumstances may an RSVP volunteer receive a fee for service from service recipients, their legal guardian, members of their family, or friends. No person, organization, or agency may request or receive any compensation for services of RSVP volunteers.

As set forth in Section 404(c) of the Domestic Volunteer Service Act of 1973 (DVSA), there is a general prohibition against grantees and volunteer stations requesting or receiving any compensation for the services of SCP, FGP, or RSVP volunteers. This prohibition is sometimes referred to as the "fee-for-service" prohibition. Section 404(c) provides the following:

> ***(c) Compensation of supervising agencies or organizations***
>
> *No agency or organization to which volunteers are assigned hereunder, or which operates or supervises any volunteer program hereunder, shall request or receive any compensation from such volunteers or from beneficiaries for services of volunteers supervised by such agency or organization.*

In some cases, determining whether a payment requested or received by a grantee or volunteer station is permissible in light of the prohibition is relatively straightforward. In other cases, however, making determinations as to whether the arrangement is permissible in light of the prohibition requires a more in-depth review, including an assessment by CNCS. More Guidance on Prohibition of

Fee-for-Service Activities, including examples can be found here: Guidance on Prohibition of Fee-for-Service Activities. If you have questions about fee-for-service contact your CNCS State Office.

2.3.8 Nepotism [**45 CFR 2553.91(h)**]

Persons selected for project staff positions may not be related by blood or marriage to other project staff, sponsor staff or officers, or members of the sponsor Board of Directors, unless there is written concurrence from the Advisory Council and with notification to CNCS.

2.3.9 Volunteer Status [**45 CFR 2553.42**]

RSVP volunteers are not employees of the sponsor, the volunteer station, CNCS, or the Federal Government.

2.3.10 Fair Labor Standards [**45 CFR 2553.91(e)**]

A sponsor that employs laborers and mechanics for construction, alteration, or repair of facilities must pay wages at prevailing rates as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended, 40 U.S.C. § 276a.

2.4 EFFECTIVE PRACTICES IN PROJECT OPERATIONS

Ensuring that the Sponsoring Organization Takes a Leadership Role

Effective practices include:

A. The sponsor values the project as an integral part of its organizational vision and operations by:
   1. Communicating the importance of the project to its Board, staff, and volunteers;
   2. Ensuring that the project has adequate administrative and fiscal support;
   3. Playing an active role in promoting the project and its contributions to the community;
   4. Meeting regularly with media, political leaders, funders, civic groups, and others to promote awareness of and support for the project; and
   5. Maintaining communication with CNCS State Office and attending state and regional training events where feasible.

B. The sponsor provides strong project leadership by:
   1. Employing a project director who demonstrates strong leadership skills in working with project and sponsor staff, volunteers, volunteer stations, and the project's Advisory Council;
   2. Establishing and, with the project director, maintaining strong working relationships with related community agencies, organizations, and leaders;
   3. Ensuring that sponsor's leadership and the project director establish and maintain a good working relationship based on clear communication and mutual support;
   4. Designating a member of the staff who has clearly defined responsibilities for project oversight and support; and
   5. Developing and maintaining clear lines of reporting between project staff and the sponsor representative.

C. The sponsor has written policies and procedures in place to ensure oversight of the project and compliance with federal rules and regulations that address topics like:
   1. National Service Criminal History Checks and special limitations including prohibited activities;
   2. Establishing and updating Memoranda of Understanding with sponsor stations;
   3. Fiscal management and internal controls related to management of RSVP project;
   4. Documentation of data management systems related to tracking project outcomes, demographics, and other performance indicators in order to verify and validate data used to meet reporting requirements.

3 PERFORMANCE MEASUREMENT & EVIDENCE BASED PROGRAMMING

3.1 CNCS PERFORMANCE MEASUREMENT INITIATIVE

Older volunteers have a tremendous amount of knowledge, skill, and experience to contribute to our communities through the enriching investment of service. Through the application of performance measurement, we balance the need to implement service projects that are fulfilling to volunteers and beneficial to communities served with the demand to demonstrate results and improve project design.

Honoring the intent and vision of the 2009 Serve America Act, CNCS has established a set of national performance measures. These measures allow all programs to use common terms, definitions, and approaches to measurement and make it possible to tell the story of national service with confidence.

CNCS's national performance measures reflect six programming priorities or focus areas which include: Disaster Services, Economic Opportunity, Education, Environmental Stewardship, Healthy Futures, Veterans and Military Families, and Capacity Building. Senior Corps allows RSVP projects to select measures from each of these areas following a performance measurement framework that is detailed in the Notice of Funding Opportunity (NOFO) or Invitation to Apply. This framework is subject to change. Specific measures are identified in the NOFO or Invitation to Apply Appendix B on the *Managing Senior Corps Grants* web page.

3.1.1 PERFORMANCE MEASUREMENT BASICS

Performance measurement is the ongoing, systematic process of tracking your program's outputs and outcomes. *Outputs* refer to the amount of service provided. They measure the completion of activities and document the fact that individuals received services, products were created, or programs were developed. *Outcomes* reflect the changes or benefits that occur. Outcomes can reflect changes in individuals, organizations, communities, or the environment. This may include changes in attitudes, knowledge, behavior, or condition.

Why measure performance?

One reason is accountability. Performance measurement satisfies the need of funders and stakeholders (including CNCS participants, board members, community members, staff and clients, and taxpayers) to see that the program or project is getting results. Performance measurement helps you communicate achievements in a way that funders and stakeholders will find meaningful and compelling.

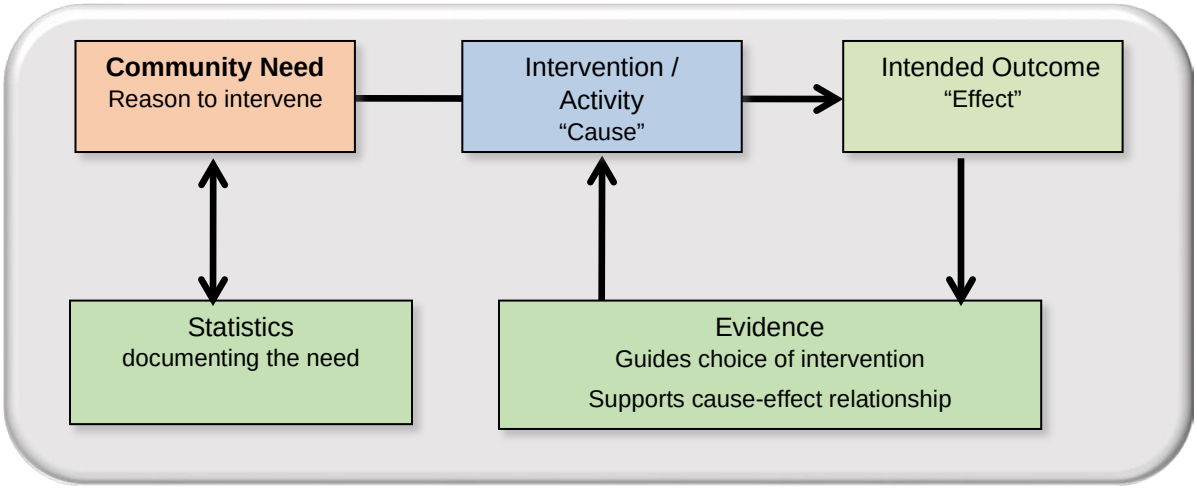
Another reason to measure performance is to determine if the change you thought would happen with your intervention is actually occurring. Performance measurement is a systematic way to collect reliable information about the intervention's implementation and progress toward outcomes.

You can also use performance measurement data to spot and correct problems. Are you reaching the population you intended? Do some people require more or less intensive service to show a positive outcome? Even when an intervention is implemented exactly as planned, performance measurement can help you find ways to strengthen the intervention to make it more effective.

Performance measurement is a way to get feedback so you know if your intervention is making the expected difference, and helps you decide how to make the most effective use of your limited resources. Performance measurement also allows you the opportunity to promote the excellence of your program.

3.1.2 THEORY OF CHANGE

A Theory of Change is used in performance measurement as a way to describe why a change is expected to happen given a particular set of circumstances. It helps you map out why a specific series of service activities or intervention will lead to expected outcomes.



A theory of change has three main elements:

- Community need
- Intended outcome
- Specific intervention or set of service activities

As you develop a theory of change for an issue that your program will address, you identify where you are now, as well as the change for which you are programming. You will choose certain activities and define the amount of service required to bring about the desired outcomes.

A strong theory of change presents statistics to document the community need and includes evidence that supports the cause and effect relationship between the intervention and outcome.

3.1.3 PERFORMANCE MEASURE WORK PLANS

Performance measure work plans are used by Senior Corps grantees to explain the design of their programs and the goals they expect to reach.

All existing Senior Corps grantees as well as applicants for new funding identify performance measures in work plans in their grant applications. For the specific requirements, see the instructions for the grant application on the *Managing Senior Corps Grants* web page.

The elements of the work plan are:

Community Need. This is the priority community issue or problem that the Senior Corps volunteers' service activities will address. The need should be measurable and include current and reliable sources to establish the compelling nature of the need. The need should be described in enough detail to convey its importance, the consequences of it going unmet, and why Senior Corps volunteers can be an effective resource to meet it. It should be described in a way that is clear to people unfamiliar with your community.

Service Activity. The service activity is the task that the volunteers will perform. The service activity is selected from a menu of pre-defined options.

Service Activity Description. The service activity description should indicate how much service is necessary to achieve the output and outcome selected. It should include who the beneficiaries are, and what the Senior Corps volunteers will be doing with them. It should outline how often Senior Corps volunteers will provide the service, for how long, and where the service will take place.

Output. These are the immediate results or products of the services provided by the Senior Corps volunteers. Accomplishments tell what was done in some quantified fashion. They include the number of persons helped, the amount of something that was created, the number of times an activity was performed, and the extent to which a program or service was expanded.

Output Instrument. This is the tool that will be used for data collection. The instrument is selected from a menu of pre-defined options.

Targets

Output and Outcome targets:

These targets are the numbers that you anticipate achieving in the third year of the performance period. For example, if you think your volunteers will serve 100 seniors in the first year, 150 seniors in the second year, and 200 seniors in the third year of the performance period as the work plan is implemented over the course of the performance of the 3-year grant, you would enter 200 as your target.

Unduplicated volunteer targets:

This is the proposed number of volunteers who will be performing each service activity. Each volunteer can only be counted once when assigned to a service activity.

The volunteer should be counted in the area where he/she will make the most impact – in terms of the type of service or in terms of the scope of service, such as the most number of hours served. Individual volunteers should **not** be counted towards multiple service areas.

Total volunteer targets:

The total number of volunteers engaged in the activities, if you were to assign all of them according to each activity, will be entered in this section. In this way, volunteers **can** be counted more than once – for example, if the same volunteer does two different types of activities such as meal delivery AND companionship, you can account for all assignments in this

Output Instrument Description. The instrument description provides an outline of the data collection plan and schedule. It should include a brief description of who will collect the data, from whom, and when it will be collected.

Outcome. These are the measurable changes in the community, persons served, or agency that occurred as a result of the service activity. Impacts or outcomes are measures of effectiveness of the program in the community or with those served, or they are measures of cost-effectiveness which show how much money or other resources the service activity saved in the community.

Outcome Instrument. This is the tool that will be used for data collection. The Instrument is selected from a menu of pre-defined options.

Outcome Instrument Description. The instrument description provides an outline of the data collection plan and schedule. It should include a brief description of who will collect the data, from whom, and when it will be collected.

3.1.4 IMPLEMENTING PERFORMANCE MEASUREMENT WORK PLANS

To implement performance measures work plans, see the instructions for completing work plans and identifying performance measures found in the Senior Corps Grant Application. Additional guidance, measurement instruments, and other resources are available on the CNCS Knowledge Network. For questions, contact your local CNCS State Office.

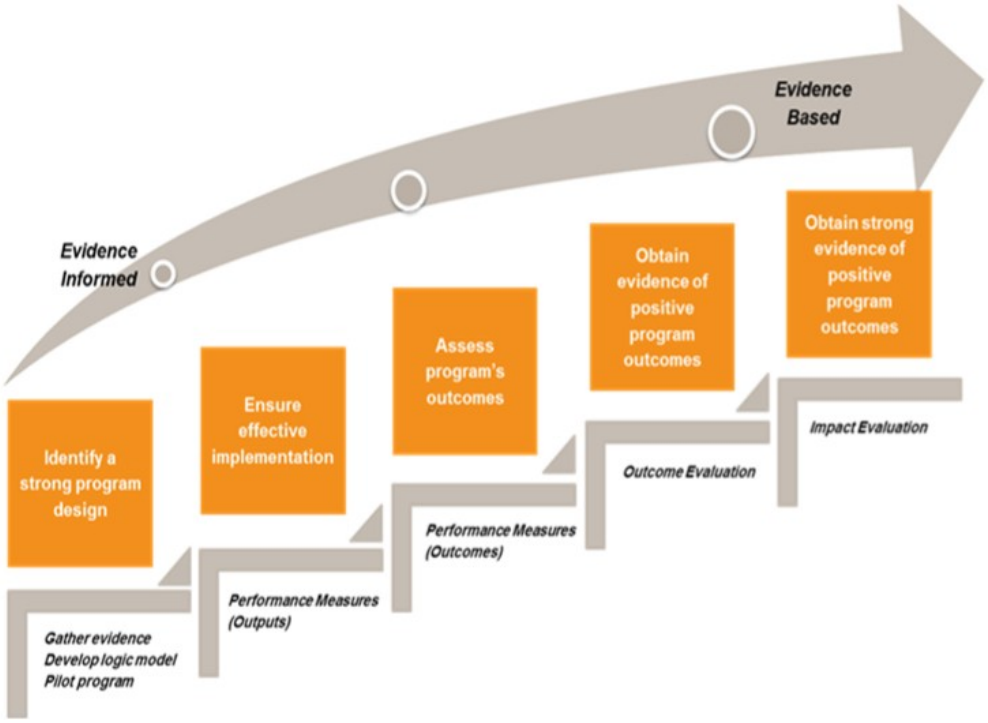
Projects are held accountable for their actual performance against specified targets. With respect to each performance measure, grantees will be expected to:

1) Report on progress achieved;
2) Make the underlying documentation of performance available for review; and
3) Report on any operational changes and project improvements that resulted from information learned from the performance data.

3.2 EVIDENCE BASED PROGRAMMING

Federal agencies, educational institutions, non-profits, and others often discuss the evidence behind program models in an attempt to understand what works and what does not. Senior Corps is joining this national conversation.

Our programs have long used evidence to support their understanding of whether the service provided is having its intended effect. Now, we seek a deeper understanding of the evidence that supports our program models recognizing that programs may have supporting evidence that exists along a continuum.



Evidence Continuum

3.2.1 Key Terms

Evidence-informed program. A program design based on academic research or program evaluations is properly referred to as *evidence informed*. For example, a program developer might use research on the development of reading skills or the physical activities that increase bone density to develop a program.

Evidence-based program. The term "evidence-based program," in general, refers to a set of activities and practices supported by a theory of change tested through rigorous program evaluations. These evaluations have demonstrated a causal relationship between program activities and specified outcomes, typically through one or more quasi-experimental or experimental field tests.

Evidence-based program model. A program model is a set of activities and practices supported by an explicit theory of change, resulting in specified outcomes. The specificity of essential elements in an evidence-based program model varies. However, evidence-based program models should address:

- Amount of contact or service over a period of time ("dosage")
- Characteristics of service recipients/communities served
- Methods of quality assurance
- Training of professional staff and supporting volunteers
- Standard procedures or curriculum
- Monitoring for *fidelity to program model*

*Replication***.** Replicating an evidence-based program with *fidelity to the model* means that essential elements of the service activity has been implemented as described in the evidence-based program model and that adaptations are relatively minor.

For an explanation of how evidence based programming aligns with CNCS efforts to ensure volunteers are engaged in work that has an impact on volunteers and their communities (including evidence-informed programming, performance measurement, and evaluation) see the *Evidence Exchange* and *Managing Senior Corps Grants* web pages.

4 COMMUNITY PARTICIPATION

4.1 LOCAL OWNERSHIP

RSVP projects are community-based projects supported by federal funds for the dual purpose of engaging persons 55 and older in volunteer service to meet critical community needs; and to provide a high quality experience that will enrich the lives of volunteers. In order to accomplish this, Senior Corps programs have a responsibility to partner with organizations in the local community to:

- Build public awareness of and support for the program within the community;
- Recruit and place volunteers to enhance the capacity of organizations and institutions within the community;
- Work to integrate senior service into the activities of other service programs within the community;
- Work toward common goals in local communities, complementing and reinforcing each other's contributions through activities related to Days of Service, Strategic Initiatives, and other local service initiatives.

Community participation is generated by individuals, groups, organizations and other national service programs. A project can garner community support through volunteer stations, local funding sources, civic and service clubs, the media, friends and family of volunteers and those with whom they work, other programs of the sponsor, schools, private non-profits, businesses, community leaders, and others who value the activities, accomplishments and impacts of the project and the volunteers.

4.2 RSVP ADVISORY COUNCIL

4.2.1 Program Requirement

The scope and extent of participation by the many entities that make up a community will vary considerably from project to project. However, all projects can benefit from the involvement of a focused and sustained core group that provides perspective and active assistance from the service area. The sponsor determines how this core group participation shall be secured, consistent with the provisions of the program regulations. [45 CFR 2553.24] For the sake of easy reference, this core group is referred to as the advisory council. If the sponsor has a board that meets the purposes and requirements of all applicable RSVP program regulations (see 45 CFR Part 2553), it is permissible for some or all of the members of that board to also serve on the RSVP advisory council, as long as the advisory council is established and operated as entity separate from the sponsor; in other words, the advisory council must not be a part of the sponsor.

4.2.2 Role

Subject to the requirements in the applicable RSVP program regulations regarding the purpose and composition of this group, sponsors have flexibility concerning the specific structure and operation of this body. Depending on local community circumstances, the advisory council may be used by the sponsor to:

- Assist in assessing community needs;

- Assist in fund raising and resource development;
- Support the development of a service ethic in the community;
- Advise on volunteer recruitment, retention, and recognition strategies;
- Suggest candidates for project staff positions;
- Link the project with other community service resources, including faith-based organizations;
- Advise on data collection and performance measurement;
- Assess project accomplishments and impact, including progress toward meeting performance measures;
- Assess satisfaction of volunteers and volunteer stations;
- Conduct annual assessment of safety of volunteers and volunteer stations (See **Appendix 9**);
- Suggest ways the project can gain increased visibility and recognition in the community; and/or
- Advise on how trends in the community are affecting seniors.

RSVP projects should keep thorough records of advisory council participation and structure such as the group's bylaws, current membership, and meeting minutes. Additional resources on Understanding the Roles and Responsibilities of Advisory Councils can be found on the Knowledge Network.

4.2.3 Membership

Remember, an effective advisory council can expand the capacity of the sponsor and project staff. The advisory council must have a membership that includes people [45 CFR 2553.24]:

- Knowledgeable of human and social needs of the community;
- Competent in the field of community service and volunteerism;
- Capable of helping the sponsor meet its administrative and program responsibilities including project assessment, fund-raising, publicity, and data reporting requirements;
- With interest an in and knowledge of the capability of older adults;
- Who are of a diverse composition that reflects the demographics of the service area.

Additional resources on Building an Effective Advisory Council can be found on the Knowledge Network.

5 PROJECT STAFF

5.1 GENERAL PROVISIONS

The project director must be an employee of the sponsor subject to the sponsor's personnel policies and practices. Sponsors may also directly employ project staff to support the project director, as well as consultants and contractors, provided that the sponsor does not delegate or sub-contract responsibility for fulfilling project management requirements. [45 CFR 2553.22 and 45 CFR 2553.25]

Hiring of project personnel must be in compliance with the Civil Rights Act of 1964, as amended, the Domestic Volunteer Service Act, the Serve America Act, other Federal civil rights statutes and regulations, applicable state laws and local ordinances, and sponsor personnel and employment practices.

5.2 STRUCTURE

The program regulations require that the sponsor employ a project director and other staff appropriate to accomplish the purposes of the project. See 45 CFR 2553.25 (b) - (e) for provisions regarding staffing levels and compensation for staff. The size of each individual project and budget levels will often dictate the number of project staff needed to effectively manage the project.

In structuring the staffing pattern, the following should be considered:

a) Size of the service area

b) Number, kind, and location of volunteer stations

c) Number of volunteers

d) Geographic distribution of RSVP volunteer assignments

e) Availability of funds

f) Meeting Performance Measure requirements which involves collecting, storing, and aggregating data

- Projects are also encouraged to consider their need for consultant or evaluation services and budget these accordingly.

g) Availability of supplemental state or federally subsidized full- or part-time staff, and RSVP or non-RSVP volunteer staff

- Senior Corps grantees can collaborate with the Senior Community Service Employment Program (SCSEP), authorized by Title V of the, Older Americans Act, to jointly engage older adults in several ways, such as:

    i. Senior Corps and SCSEP grantees can work together to enable their participants to support joint community service projects;

ii. SCSEP participants nearing their 4-year limit on participation may be interested in participating in Senior Corps;

iii. Senior Corps volunteers, who meet age and income qualifications and seeking paid employment, may be interested in participating in SCSEP.

iv. More information about SCSEP grantees see the Senior Community Service Employment Program website.

- Volunteer staff, consistent with the nature and purpose of CNCS volunteer programs, are persons with management experience and others with experience in office operations, who may be deployed to strengthen and expand the operations of RSVP projects.
- RSVP volunteers can perform non-budgeted staff functions under supervision of the RSVP staff. Non-RSVP volunteers can be budgeted as in-kind contributions for necessary project operational functions. Consult the CNCS State Office for additional guidance.

5.3 PERSONNEL POLICIES FOR PROJECT STAFF

The applicable RSVP program regulations require that project staff be covered by sponsor personnel policies [45 CFR 2553.25]. At a minimum, policies should address salaries and fringe benefits, probationary periods of service, national service criminal history checks, suspensions, resignations, hours of employment, vacations, sick leave, holidays, terminations, and grievance procedures.

1) Compensation levels for project staff, including wages, salaries, and fringe benefits must be comparable to like or similar positions in the sponsor organization and/or the project service area [45 CFR 2553.25(e)].

2) The sponsor should prepare a job description for each project staff position to promote the recruitment of qualified applicants and to specify each position's authority and responsibility. It is recommended that an annual performance evaluation be completed for all staff.

3) It is critical that Senior Corps sponsors make **National Service Criminal History Checks** (NSCHC) a priority when hiring project staff. ***Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance***. Please read this section and the NSCHC webpage carefully to be sure your policies and your implementation procedures are in compliance with the requirement. Grantees should contact their CNCS program officer for NSCHC questions or requirement clarification.

   You will find an **NSCHC Supplement** to Chapter 5 regarding NSCHC in the appendices.

5.3.1 NSCHC Overview

Under the National and Community Service Act of 1990, as amended by the Serve America Act, all CNCS grantees must conduct NSCHC on **grant-funded staff** and national service participants that receive a salary, national service education award, living allowance, or stipend under CNCS grants. Individuals in these positions must undergo the process in a timely manner, or the noncompliant grantee may be subject to cost disallowance. Certain parts of the process need to

occur prior to charging any staff time to a CNCS grant. Therefore, it is critical to comply with the NSCHC requirements **on time, every time**.

The Code of Federal Regulations outlines the Nationals Service Criminal History Check rules and regulations in full at 45 CFR 2540.200–207. Additional information on NSCHC, including the **required annual NSCHC e-course**, an FAQ document, and links to technical assistance resources can be found on the NSCHC webpage.

These requirements are statutory minimums, and individual grantees can, and often should, supplement these with additional safeguards for vulnerable populations, such as additional screening mechanisms, additional eligibility criteria, a code of conduct, training for staff and volunteers, and a clear system for reporting and handling reports of any harm or potential harm to vulnerable populations resulting from their program. Contact your CNCS State Office for more resources on ways to protect your program's vulnerable beneficiaries.

5.3.2 NSCHC Enforcement

Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. More information on cost disallowance can be found in the Interim Disallowance Guide for Staff and Grantees. Grantees that self-report non-compliance to a monitoring official prior to any written notice of future oversight or monitoring activity (such as IPERA sampling, IG audit or investigation, site visit, desk review, etc.) may receive a reduction in their cost disallowance. As a result, it is in an organization's interest to develop a system for monitoring its own compliance.

5.3.3 NSCHC Resources

Link to CNCS Knowledge Network/Criminal History Checks for links to the regulations, requirements, and training materials. Video Training, NSCHC eCourse, FAQs , NSCHC Documentation Checklist is especially helpful to Senior Corps grantees.

5.4 PROJECT STAFF ROLES

5.4.1 Project Director

1) The sponsor assigns responsibility for the project's daily management to the project director. A project director functions as a working project manager, actively involved with community organizations, RSVP volunteers, and volunteer stations. The sponsor should establish procedures for internal review and approval of project director performance in accordance with its standard policies and procedures. The project director may serve as the representative of the sponsor in signing and approving official project documentation, including project reports, memoranda of understanding, and letters of agreement for in-home assignments.

2) The project director serves full-time, except as negotiated otherwise with CNCS. A full-time project director may not serve concurrently in another capacity, paid or unpaid, during established working hours. A sponsor may negotiate in writing the employment of a part-time project director with CNCS when it can be demonstrated that such an arrangement will not adversely affect the size, scope, and quality of project operations. The project director may participate in activities to coordinate

program resources with those of related local agencies, boards, or organizations. [45 CFR 2553.25(c)]

3) In the case it becomes necessary to dismiss a project director for cause, sponsors should follow their established personnel policies and procedures. **When such action is apparent, (as well as in any other situation where the project director resigns) the sponsor should immediately notify the CNCS State Office, stating the reason(s) for the action,** When necessary, provisions for temporarily continuing operations without a project director should also be submitted to the CNCS State Office in writing.

4) Under direction of the sponsor's executive director /CEO or designee, the project director's duties typically include, but are not limited to:

   a) Assessing volunteer needs of the community and planning and developing all phases of the project operation.

   b) Selecting, training, supervising, and evaluating project staff.

   c) Recruiting, orienting, placing, and arranging for assignment of RSVP volunteers.

   d) Incorporating performance measurement principles and practices in program development, volunteer placement, and project assessment.

   e) Maintaining appropriate fiscal and program records and preparing reports.

   f) Developing and maintaining close coordination with volunteer stations.

   See **Appendix 6** for a sample position description for an RSVP Project Director

   g) Enhancing the total project effort through active involvement with community organizations, other national service programs, and other senior and volunteer programs.

   h) Keeping RSVP advisory council members informed and soliciting their advice on matters affecting project operation; providing staff assistance to the advisory council.

   i) Working in cooperation with sponsor staff, advisory council members, and volunteer station staff to obtain resources for the project.

   j) Providing information and support to RSVP volunteers.

   k) Assessing appropriateness and performance of volunteer stations.

   l) Attending training conferences conducted or authorized by CNCS.

   m) Preparing and submitting applications and requests for amendments in the electronic grants system.

5.4.2 Project Coordinators

When funds allow, and the project director is in need of professional assistance, additional staff may be hired to help coordinate project activities.

Coordinator responsibilities may include, for example:

1) Coordinating and monitoring RSVP volunteer assignments, in-service training, supervisory arrangements, and other activities in cooperation with appropriate volunteer station staff.
2) Making periodic visits to volunteer stations to monitor the satisfaction of the RSVP volunteers with their assignments and progress toward achieving expected outcomes and impact of their assignments.
3) Enhancing the total project effort through active involvement with community organizations, other national service programs, and other senior and volunteer programs.
4) Providing information and support to RSVP volunteers.
5) Assessing appropriateness and performance of volunteer stations.
6) Attending training conferences conducted or authorized by CNCS as funding allows.

5.5 Effective Practices for Building Project Staff

Effective practices for creating and sustaining a strong working relationship among the sponsor's executive and fiscal staff, the project director, and other project staff include:

A. Sponsor leadership and the project director establish and maintain a productive working relationship based on clear communication and mutual support;

B. The project director has clearly defined responsibilities and written policies and procedures for project operations and support;

C. The sponsor develops and maintains clear lines of reporting between project staff and the sponsor's executive and fiscal staff;

D. The sponsor develops a written job description for each project staff position and annually reviews job descriptions for any changes in roles or responsibilities;

E. The sponsor provides staff with high quality supervision and support to maximize job performance;

F. The sponsor ensures project staff receive an orientation to the Senior Corps, RSVP, and the project prior to their assuming project responsibilities;

G. The sponsor provides project staff with opportunities to enhance their understanding of and skills in meeting the needs of the community;

H. The sponsor encourages project staff to showcase their expertise as national and community service professionals by presenting at conferences, workshops, or community forums;

I. The sponsor includes project staff in professional development opportunities available to all other agency staff;

J. The sponsor ensures that each project staff member sets performance goals for his or her work on an annual basis and is evaluated annually on that basis;

K. The sponsor includes the project director as an integral member of the agency's staff;

L. The sponsor recognizes the achievements of project staff through specific activities and/or events comparable to other agency staff;

M. The sponsor seeks ethnic, racial, cultural, and skills diversity in volunteer teams and/or working groups that address project planning, operations, and assessment; and

N. The sponsor seeks the participation of individuals from diverse ethnic and racial backgrounds and with a variety of skills in project management and decision-making.

6 VOLUNTEER STATIONS

6.1 INTRODUCTION

RSVP volunteers are recruited and enrolled by the RSVP project and placed with or through volunteer stations. Volunteer stations are encouraged to support RSVP by referring prospective volunteers to the project.

6.1.1 Characteristics of Volunteer Stations

A volunteer station is a public agency, secular or faith-based private non-profit organization, or proprietary health care organization that accepts the responsibility for assignment and supervision of RSVP volunteers. Each volunteer station must be licensed or otherwise certified, when required, by the appropriate state or local government. Neither informal groups nor private homes qualify as volunteer stations. [45 CFR 2553.12(s)]

Proprietary health care organizations are health care facilities that are privately owned and operated for profit. As noted above, licensed proprietary health-care organizations may be volunteer stations. All such placements must limit volunteer assignments to those which provide direct and traditional assistance to patients, such as visiting, teaching, counseling, entertaining, etc. Placements must not displace paid employees, must not supplant the hiring of paid employees, and must avoid other staff or clerical assignments which would accrue to the profitability of the proprietary health-care organization.

The Memorandum of Understanding with such volunteer stations must include detailed provisions to ensure compliance with program regulations regarding *Non-displacement of Employed Workers and Non-impairment of Contracts for Service* [45 CFR 1216.1.1 - 1216.1.4]

Individual private homes may not be volunteer stations. In-home assignments are made only through a volunteer station (see *In-Home Assignments* in Chapter 7).

Volunteer stations are located within the project's service area as defined in the approved grant application.

6.1.2 Types of Volunteer Stations

RSVP volunteers may serve in many different types of volunteer stations, including, but not limited to:

Examples of Volunteer Stations	
Before/After School Programs	Health Education Programs
Community Development Non-Profits	Hospitals/Medical Centers
Corrections Facilities	Job Placement Centers
Elementary Schools	Secondary Schools
Environmental Programs	Shelters (homeless, abused, etc.)
Food Banks/Gleaning Programs	Tax Preparatory Centers
Head Start Programs	Veterans Service Centers

6.1.3 RSVP Project or Sponsor as Volunteer Station

The RSVP project itself may function as a volunteer station or initiate special volunteer activities provided that CNCS agrees that these activities are in accordance with program objectives outlined in the grant and will not hinder overall project operations [45 CFR 2553.61].

1) Project operations can be strengthened by the assignment of RSVP or non-RSVP volunteers to responsible roles under direction and control of the RSVP director. Projects cannot include the time of RSVP volunteers in the grant budget as part of the grantee match as they can with non-RSVP community volunteers who satisfy guidelines for project in-kind contributions.

2) The sponsor may function as a volunteer station, but no more than 5 percent of the total number of volunteers budgeted for the project may be assigned to the sponsor in administrative or support positions. This limitation does not apply to the assignment of volunteers to other service programs administered by the sponsor or to special volunteer activities of the project [45 CFR 2553.61].

6.1.4 Volunteer Station Cash or In-Kind Support of Volunteers

In accordance with 45 CFR 2553.91(c)(3) an RSVP volunteer station may contribute to the financial support of the RSVP project. However, this support shall not be a required precondition for a potential station to obtain RSVP volunteers. If a volunteer station agrees to provide funds to support additional volunteers or pay for other volunteer support costs, the agreement must be stated in the written Memorandum of Understanding with the station. The sponsor must withdraw services if the station's inability to provide monetary or in-kind support to the project under the Memorandum of Understanding diminishes or jeopardizes the project's financial capabilities to fulfill its obligations. Cash or in-kind support from a station should not be confused with fee-for-service. See Guidance on Prohibition of Fee-for-Service Activities.

6.1.5 Volunteer Station Roster

A current roster of volunteer stations must be included in the electronic grants management system with each grant renewal or continuation application. Projects will enter the names and addresses of their stations, the names and contact information for the volunteer station supervisors, a various other information for each station. Step-by step instructions for developing and submitting Station Rosters are found on the Managing Senior Corps Grants webpage.

6.2 VOLUNTEER STATION ROLES AND RESPONSIBILITIES

6.2.1 Responsibilities of RSVP Volunteer Stations

A list of Volunteer Station responsibilities can be found in the RSVP Regulations 45 CFR 2553.62. RSVP project staff should work with Volunteer Stations to ensure that station staff understand their responsibilities including:

1) Signing the Memorandum of Understanding (MOU) prior to placement of volunteers. (See *Preparation of the Memorandum of Understanding* in Chapter 6 for more information.).
2) Assisting projects with development of performance measurements that include written volunteer assignment descriptions that lead to the accomplishment of the project's output and outcome targets.

3) Assigning a Volunteer Station staff member to be responsible for supervision of the RSVP volunteers assigned to the station. The supervisor should be able to verify volunteer time at the site.
4) Collecting and keeping the records and other data needed for RSVP reports, and preparing reports as required.
5) Providing for the safety of RSVP volunteers assigned to the station.

6.2.2 Additional Responsibilities

The program regulations also provide that volunteer stations undertake such other responsibilities as may be necessary to the successful performance of RSVP volunteers in their assignments or as agreed to in the Memorandum of Understanding. [45 CFR 2553.62(g)]. Additional responsibilities may include providing volunteers with:

- Recognition
- Meals
- Transportation. (Note: Project funds may be used to reimburse volunteers for expenses, including transportation costs, incurred while performing their volunteer assignments, provided that these expenses are described in the Memorandum of Understanding with the volunteer station and there are sufficient funds available to cover these expenses and meet all other requirements identified in the Notice of Grant Award [45 CFR 2553.43(e)]. Otherwise, such expenses are the responsibility of the volunteer station. For more information see Chapter 9.)

6.2.3 Letters of Agreement for In-Home Assignments

Under 45 CFR 2553.62(c) volunteer stations that manage assignments in private homes must obtain a Letter of Agreement describing and authorizing the RSVP volunteer activities in each home (See **Appendix 5** for more information and a sample letter). The Letter of Agreement must be agreed to and signed by the individual served in the private home, or his/her legal representative; and the volunteer station. The Letter of Agreement should be prepared by the volunteer station for the signature of these parties. The requirement for Letters of Agreement is incorporated in the Memorandum of Understanding.

6.3 PREPARATION OF THE MEMORANDUM OF UNDERSTANDING

6.3.1 Purpose

The Memorandum of Understanding, which must be negotiated prior to placing volunteers, describes program requirements, working relationships, and mutual responsibilities between the sponsor and the volunteer station. The Memorandum of Understanding includes general conditions applicable to all projects and volunteer stations and special conditions applicable to the local volunteer station. The basic requirements for the Memorandum of Understanding are found in the regulations at 45 CFR 2553.23(c)(2). (See **Appendix 1** for a sample Memorandum of Understanding.)

6.3.2 Renegotiating and Updating

The Memorandum of Understanding must be reviewed and renegotiated at least every three years. The Memorandum of Understanding may be amended at any time by mutual agreement. Projects are encouraged to require volunteer stations to notify them as soon as any circumstances arise which could

affect or require changing the provisions of the Memorandum of Understanding, such as the volunteer station's ability to meet commitments for providing specified contributions toward project costs, changes in the sites where volunteers serve, or other conditions which have a bearing on volunteer assignments.

6.3.3 Content

Each volunteer station must have a Memorandum of Understanding in effect, which ensures the placement of RSVP volunteers. The Memorandum of Understanding is a formal arrangement between the sponsoring organization and the volunteer station and in many cases it serves as the primary source of documentation establishing the relationship between entities.

As set forth at 45 CFR 2553.23(c (2), the Memorandum of Understanding must:

1) Be negotiated prior to placement;
2) Specify the mutual responsibilities of the station and sponsor;
3) Be renegotiated at least every three years; and
4) State that the volunteer station assures it will not discriminate against RSVP volunteers or in the operation of its program on the basis of race; color; national origin, including individuals with limited English proficiency; sex; age; political affiliation; religion; or on the basis of disability, if the participant or member is a qualified individual with a disability.

The MOU should be customized to meet the needs of the project and the volunteer stations. See **Appendix 1** for a sample MOU form.

In addition to the above requirements we highly recommend that you include:

1) The name, street and e-mail addresses, and telephone and fax numbers of the volunteer station.
2) The name of the primary volunteer station staff member responsible for day-to-day supervision of RSVP volunteers and a description of supervisory arrangements.
3) Volunteer station and sponsor contributions to support RSVP volunteers (meals, insurance, transportation, and recognition) and/or other project costs.
4) A data sharing agreement that includes a description of the data needed from the volunteer station to complete the project's performance measures, a schedule for delivery, and a description of who will collect the data.
5) An assurance that the volunteer station is a public or non-profit organization or a proprietary health care agency.
6) A description of prohibited activities and special limitations (outlined in Chapter 2).
7) Provision for the safety of the RSVP volunteers while on assignment.
8) Provision for a Letter of Agreement for in-home assignments. (See **Appendix 5** for more information.)

9) Assurance that the volunteer station provides reasonable accommodation(s) for persons with disabilities (including those with mobility, hearing, vision, mental and cognitive impairments or addictions and diseases) to participate in programs and activities.

10) An agreement that the volunteer station shall provide required reports.

You may also want to include:

1) An estimate of the number of volunteer assignments projected to be available with or through the volunteer station.

2) A listing of geographic locations/sites, other than private homes, where volunteers will serve through the volunteer station and the number of volunteers placed at each site.

3) The average number of persons the volunteer station serves annually.

6.4 Effective Practices For Managing Volunteer Stations

I. Effective Practices for Developing Volunteer Stations

The sponsor develops a system of volunteer stations that:

A. Addresses significant needs of the community as validated by community-accepted studies and reports prepared by government, community groups, or educational institutions ;
B. Provides a sufficient number of stations that are accessible to individuals with disabilities;
C. Is manageable in terms of size and complexity to ensure that ongoing interaction, communication, and monitoring of stations are realistic.
D. Incorporates the abilities, experience, and needs of senior volunteers in their programs and operations.

II. Effective Practices for Communication between the Project and Volunteer Stations

The sponsor establishes clear and effective systems of communication between the project and volunteer stations by:

A. Conducting an orientation for station staff about the Senior Corps, RSVP, and the project prior to the placement of volunteers.
B. Communicating to the volunteer stations its policies on the terms and conditions of RSVP volunteer service; volunteer service termination; and procedures for volunteers to appeal adverse decisions related to volunteer stations.
C. Providing volunteer stations with ongoing information and/or training about the project, its performance measurement goals, and the role of the volunteer station in meeting those goals.
D. Developing a checklist, guidance, and/or criteria that identifies factors in selecting volunteer stations.
E. Developing criteria for the optimal number of volunteers serving at each station.

III. Effective Practices for Working with Volunteer Stations to Achieve Performance Measures

A. The sponsor and project staff make informed decisions about the community needs to be addressed and the volunteer stations that provide placement opportunities for RSVP volunteers. The project:
    1. Identifies the needs and priorities that the project will address and the agencies that serve them;
    2. Uses data to document the nature and scope of the needs and why they have been selected, and works with volunteer stations on data collection methods;
    3. Consults staff, RSVP volunteers, the volunteer stations, and the Advisory Council in determining priority community needs on which the project will focus;
    4. Works with each volunteer station to determine the service to which RSVP volunteers are assigned; and
    5. Identifies and communicates its anticipated accomplishments and goals to the volunteer station supervisors.
B. The project works with volunteer stations to collect data that measures progress in achieving the anticipated performance measurement targets. The project and volunteer stations:

1. Work together to determine the types of data needed to measure progress in achieving its output and outcome targets;
2. Determine, prior to initiating service efforts, the data collection instrument descriptions it will use as the standards for measuring and reporting progress;
3. Collaborate to develop and implement an information system that utilizes existing data whenever possible, produces the information needed to demonstrate outputs and outcomes ; and allows information to be easily retrieved;
4. Consistently and accurately provide the needed data;
5. Use the assessment to adjust service assignments and the project's portfolio of volunteer stations;
6. Work together to use the information related to accomplishments to identify the strengths and weaknesses of the project's programming and to develop specific steps to strengthen volunteer services provided in the community; and
7. Work together to modify volunteer assignments to more effectively meet the identified needs.

7 RSVP VOLUNTEER ASSIGNMENTS

7.1 CRITERIA FOR VOLUNTEER ASSIGNMENTS

7.1.1 General Criteria

RSVP projects will develop volunteer assignments in alignment with RSVP performance measure work plan outcomes and will do so prior to the recruitment of RSVP volunteers. Volunteer assignments should incorporate how the assignment will support performance goals and the service described in the proposed work plans. Assignments serve the dual purpose of providing a high quality experience for volunteers and meeting critical community needs.

7.1.2 Match Volunteer Interests and Abilities

Assignments are matched to the interests, abilities, preferences, and availability of volunteers. Special consideration is to be given to developing assignments that allow for volunteers with limited physical strength and mobility or other disabilities.

7.1.3 Assignment Descriptions

Volunteer stations provide a written outline of duties or description of individual assignments [45 CFR 2553.12(c) and 2553.62]. These should be maintained on file in the RSVP office or at the volunteer station and a copy should be given to each volunteer when assigned. Written assignments help to identify and clarify what the volunteer is expected to do and help to avoid misunderstanding. (See **Appendix 4** for a sample RSVP volunteer assignment description.)

7.1.4 Referrals

If, for any reason, a prospective volunteer cannot be placed through RSVP, the project director should refer that person to other volunteer service opportunities whenever possible.

7.1.5 Capacity Building by RSVP Volunteers

Capacity building activities expand the *scale, reach, efficiency,* or *effectiveness* of programs and organizations. Activities may also *leverage resources* for programs and/or organizations. For example, capacity building activities may expand services, enhance delivery of services, or generate additional resources. These activities achieve *lasting positive outcomes for the beneficiary populations* served by CNCS-supported organizations.

In this regard, RSVP volunteers may serve in a fund raising capacity for community organizations and for the RSVP project itself. Fund raising for the project should be limited as it is not the primary activity of the RSVP project or its volunteers.

7.1.6 Service on Boards and Advisory Councils

RSVP volunteers may serve on boards and advisory councils of private non-profit or public agencies as part of Other Community Priority work plans. These volunteers are eligible for volunteer benefits. Similarly, RSVP volunteers serving as members of their RSVP advisory council are eligible for volunteer benefits.

7.2 SELECTION OF ASSIGNMENTS

7.2.1 Range of Options

Assignments and terms of service, including service hours, should reflect individual RSVP volunteer preferences and align with the project's National Performance Measure outcomes. Project and volunteer station staff should ensure that a range of service opportunities are available to provide a variety of choices that will have a measureable impact on the community. Below are examples of appropriate and inappropriate RSVP volunteer assignments. Please contact your program officer should you have specific questions about your project assignments.

Appropriate Assignments	Inappropriate Assignments
Organizing neighborhood watch programs	Street traffic control
Tutoring and mentoring disadvantaged or disabled youth	Participating in "ride along" with on-duty officers
Renovating homes	Performing emergency duties assigned to fire or police employees
Teaching English to immigrants	Serving as paramedics, emergency medical technicians (EMT) or other in other emergency medical service roles
Assisting victims of natural disasters	Any roll that would otherwise be performed by an employed worker

7.2.2 IN-HOME ASSIGNMENTS

7.2.2.1 Careful Planning with Volunteer Stations

Assignment of RSVP volunteers in the homes of persons served requires planning by the RSVP director and by volunteer station professional staff, in cooperation with the person to be served. In-home placements may be made through many types of volunteer stations. These include, but are not limited to: juvenile diversion programs; mental health centers; health organizations; hospitals; visiting nurse associations; hospice programs; and home-health agencies.

7.2.2.2 Volunteer Station Responsibilities

Project staff must exercise good judgment in arranging in-home placements. It is recommended that projects secure the volunteer station's commitment to:

1) Provide regular and ongoing training for RSVP volunteers regarding their specific assignments.

2) Conduct regularly scheduled meetings with the RSVP volunteers to review activities, any problems encountered, and progress made toward outcomes. Since traditional forms of supervision are difficult in home settings, ensuring volunteer station staff meet regularly with volunteers placed in homes is a critical part of the RSVP director's responsibility.

3) Visit the RSVP volunteer in-home with the assigned person on a regularly scheduled basis.

4) Address other specific conditions included in the Memorandum of Understanding, including obtaining a Letter of Agreement for an RSVP volunteer assigned in-home [45 CFR 2553.12(g) and 2553.62(c)]. (See Chapter 6 for more regarding Letters of Agreement.)

7.3 ASSIGNMENTS TO PROMOTE VOLUNTEER LEADERSHIP

7.3.1 Skill Development and Capacity Building

Developing and cultivating the leadership capacity of RSVP volunteers is one of the best ways to ensure a high quality volunteer experience, volunteer-driven program expansion, and sustainable services to the community. The RSVP program model allows local RSVP projects to develop assignments in alignment with performance measures that strengthen the project and build volunteer station capacity, while strengthening the volunteers' leadership skills. You can find a RSVP Sample Volunteer Assignment Description in **Appendix 4** and additional resources on the Knowledge Network.

7.3.2 Examples of Leadership Roles

Leadership opportunities allow RSVP volunteers to form a deeper connection to a project while learning valuable tools in volunteer coordination, project planning or outreach.

As RSVP "leaders," volunteers can, for example:

- Recruit and coordinate volunteers for a volunteer station.
- Assist the RSVP project director with recruitment and coordination of RSVP volunteers.
- Support project planning, volunteer training, or relationships with individual volunteer stations.
- Develop and prepare project materials.
- Assist volunteer stations with performance measures, including data collection tools or methods.
- Conduct outreach to the community.
- Garner financial, in kind, and other forms of support for the RSVP project.

7.4 TERMINATION OF ASSIGNMENTS

a) The project staff and volunteer stations should be alert to changes or problems that may lead to assignment terminations, such as when the relationship is no longer satisfying to the RSVP volunteer or when a station is going to be graduated.
b) A former volunteer station is a station that is no longer active. A station may be a former one if the activities of the station no longer align with the project's program design. Volunteers associated with this station can be provided other service opportunities through other service stations, may continue to volunteer outside of the RSVP program, or may choose to terminate their service.
c) Regardless of the cause of termination of an assignment, the decision must be made jointly by project and volunteer station staff, with full consideration given to the volunteer, including placement with another volunteer station, as appropriate.
d) Sponsors are asked to keep the CNCS State Office fully informed in cases of terminations, voluntary or otherwise, that have potential legal implications for RSVP staff or the project.

7.5 EFFECTIVE PRACTICES IN RSVP VOLUNTEER ASSIGNMENTS

I. Effective Practices for Drawing on the Unique Qualities of Volunteers to Meet the Needs of the Community and those Served

The project:

A. Ensures variety among volunteer stations such that volunteer assignments appeal to a diverse group of volunteers and accommodate varying volunteer skills and interests;

B. Works with volunteer stations to involve volunteers in developing volunteer assignments;

C. Routinely notifies volunteers of new volunteer assignments that are developed or become available; and

D. Ensures that volunteer stations provide volunteer assignments that challenge volunteers to be advocates on behalf of the community.

E. For outcome based assignments, ensures that the assignment supports the projects performance measure outcomes.

II. Effective Practices for Ensuring the Safety of RSVP Volunteers

The project:

A. Addresses all relevant safety issues, including service conditions at volunteer stations, prior to permitting RSVP volunteers to begin their assignments;

B. Addresses reasonable accommodation to volunteers who are qualified individuals with disabilities according to Section 504 of the Rehabilitation Act;

C. Works closely with volunteer stations to ensure that RSVP volunteers are provided with pre-service and ongoing training on safety issues;

D. Works jointly with volunteer stations to assess, on a regular basis, safety issues related to RSVP service; and

E. Promptly and effectively responds to RSVP volunteers' emergencies and complaints and designates a staff person to respond to such concerns.

III. Effective Practices for Communicating with RSVP Volunteers

The project clearly communicates with RSVP volunteers about their roles and responsibilities by:

A. Developing a written volunteer assignment description that specifies the needs of the community and the role and activities of the RSVP volunteers in delivering the needed services (See **Appendix 4** for an example of an RSVP assignment description form.)

B. Providing volunteers with a handbook that includes project policies and procedures, the conditions and terms of volunteer service, holidays, service schedules, and cost reimbursements; and

C. Ensuring that RSVP volunteers know their key contacts and sources of assistance or help during their service, and how to contact them.
D. The project encourages volunteer stations to set up a process for appraising and documenting volunteer performance that provides feedback and guidance to each volunteer in key areas such as: reliability, actual progress and outcomes, initiative, and leadership.

8 RSVP VOLUNTEERS

8.1 ELIGIBILITY TO BE ENROLLED

8.1.1 Requirements

RSVP volunteers must be 55 years of age or older, agree to serve on a regular basis without compensation, and reside in or nearby the community served by RSVP. They must also agree to abide by all legal requirements of the RSVP program and to accept instruction and supervision as required. [45 CFR 2553.41(a)]

8.1.2 Non-Discrimination

Eligibility to be an RSVP volunteer may not be restricted on the basis of formal education, experience, race, religion, color, national origin, sex, sexual orientation, age, disability status, or political affiliation. [45 CFR 2553.41(b)

8.2 RECRUITMENT OF RSVP VOLUNTEERS

8.2.1 Preparation

1) Before RSVP volunteers are placed at a volunteer station, the sponsor must have a signed Memorandum of Understanding with the volunteer station and have developed, in conjunction with the volunteer station, written assignment descriptions for each RSVP volunteer.

2) Recruitment and enrollment of eligible RSVP volunteers are project responsibilities and should not be delegated to volunteer stations. Recruitment assistance for new RSVP volunteers, in the form of referrals, may come from the RSVP advisory council, volunteer stations, and other RSVP volunteers.)

3) A volunteer recruitment plan should take into account the following, among other considerations:

    a. Location of “active adult” or retirement communities, senior citizen housing, senior centers, clubs, and other settings where people age 55 and older gather or receive services.

    b. Local employers of age eligible, or soon to be eligible, Baby Boomers in both the private and public sectors, as well as independent businesses and trades people.

    c. Distance (in both miles and time) between the potential RSVP volunteer and places of assignment.

    d. Modes and estimated costs of available public or private transportation.

4) Special efforts should be made to recruit and assign members of minority groups, persons with disabilities, and hard-to-reach individuals and groups in the service area which are under-represented in the project.

5) Special management and capacity building needs to offer challenging assignments to retired professionals, managers, administrators, or others with specialized skill sets who would find such assignments engaging.

6) RSVP stresses recruitment and enrollment of eligible persons not already volunteering.

7) Projects should focus their recruitment efforts within their own service areas. When volunteers from adjacent areas where there is an RSVP project want to serve within the service area of another project, the two project directors should consult to ensure that this in the best interest of the volunteer and the program. Such cases may arise where transportation to a volunteer station in an adjacent area is more convenient or where a station in the adjacent area has need of a volunteer's special skills and no similar opportunity exists in the area where the volunteer resides.

8.2.2 Choosing Recruitment Methods

Although direct, face-to-face communication with prospective volunteers is most productive, a variety of recruitment methods may be used to reach either broad audiences or specific populations. The choice of the most feasible method will depend on:

1) Availability of recruitment resources (the project's website, social media, newspapers, access to radio and television public service time, available staff, outreach volunteers, etc.).

2) Community acceptance of volunteer programs and federally funded programs.

3) The degree to which communication links exist with seniors, including older members of minority groups, persons with disabilities, and hard-to-reach community members.

8.2.3 Examples of Methods

Recruitment can be done through:

1) Contacting potential recruits individually.

2) Presently enrolled RSVP volunteers.

3) Using an RSVP volunteer recruitment specialist for recruiting persons with special skills, such as technical, professional, or management skills.

4) Making presentations or providing materials for distribution at retirement preparation programs of local employers.

5) Contacting agencies and organizations frequented by older persons, such as senior centers, senior nutrition projects, and retiree organizations such as retired teachers associations, and retired federal employees associations.

6) Contacting religious and civic groups and other community agencies.

7) Contacting other CNCS volunteer programs.

8) Advertising through websites, web-based volunteer recruitment systems including *AllforGood.org* (see below), the sponsoring agency's newsletter, newspaper articles, public

service radio or television interviews, or "spot" public announcements, and the use of social media.

9) Contacting inactive volunteers.

   a. Use volunteers, if necessary, to find out from inactive volunteers why they have become inactive. These volunteers may be reactivated if circumstances causing their inactivity have been or can be changed.

   b. Include inactive volunteers on mailing lists and in recognition activities if there is potential for their reactivation.

8.2.4 Targeting Volunteers

Targeting recruitment where there is the best possibility of obtaining the most publicity and results, may result in organizations or locations being included where older persons are presently serving as volunteers. Projects should, however, avoid recruiting volunteers away from organizations where they are already volunteering and thus negatively impacting the project's reputation in the community.

8.2.5 Web-Based Recruitment

8.2.5.1 Project Websites

Increasing numbers of RSVP projects have developed appealing websites designed to provide basic information about volunteer opportunities and how to express interest in volunteering.

8.2.5.2 AllforGood.org

All for Good **is** a free online volunteer recruitment system where projects can register their organizations and post their volunteer opportunities and connect with volunteers to learn about them.

8.2.5.3 Social Networks

A *Social Network* describes any virtual media that enables users to create public profiles within it and form relationships with other users of that same space who access their profile. Social networking sites can be used to describe community-based websites, online discussion forms, chatrooms and other social spaces online and primarily contain user-generated content. Examples of social networks are Facebook, Twitter and YouTube channels, and others described below:

a) Key Terms

- Blog
  - A website, usually maintained by an individual, with regular entries of commentary, descriptions of events, or other material such as graphics or video, used to communicate information and receive feedback.
- Online Collaborative and Discussion Groups
  - A discussion group format to connect with people, access information, and communicate effectively over email and on the web.
  - You control the members of the discussion group.
  - No hardware or software to buy, install or maintain.
  - Access from anywhere, even from mobile devices.
- Online Volunteer Recruitment Sites

- Online network that connects volunteers with nonprofit organizations.
- Resource for volunteers to search for volunteer opportunities in their neighborhood, community, city and nationally.
- When volunteers see your listing, they simply click on it to directly connect with your organization and get involved.

b) CNCS Social Media Hub includes:

- YouTube
  - YouTube is a video sharing website
  - A channel on YouTube is the home page for an account. It shows the account, the account type, the public videos they've uploaded, and any user information they have entered.
  - YouTube channels often display favorite videos from other users, activity streams comments, subscribers, and other social network features.
  - You can control the information that appears on your channel.
- Twitter
  - Twitter is an online social networking service that enables users to send and read short 140-character messages called "tweets".
  - A service for friends, family, and coworkers to communicate and stay connected through the exchange of quick, frequent messages.
  - Tweets may contain photos, videos, and links to other social network sites.
  - Senior Corps Twitter handle: @seniorcorps
  - CNCS Twitter handle: @cncs

8.3 SELECTION OF RSVP VOLUNTEERS

8.3.1 Interviewing Potential RSVP Volunteers

After expressing an interest in volunteering through RSVP, potential volunteers should be scheduled for interviews with RSVP project staff as soon as possible. The initial interview should be private and confidential, allowing adequate time for discussion. These interviews should be conducted in the most efficient manner for RSVP staff and the potential volunteer either in person, via phone, or other means such as skype.

a) The initial interview is the time to become acquainted with and establish a friendly, mutually supportive relationship with the prospective RSVP volunteer.
b) Interview techniques should relate to project goals and to the background, hobbies, and special interests of applicants.

Suggested interview topics include:

- Interests of the applicant and motivation to serve.
- Background information on the potential volunteer including work and volunteer history.
- Roles, assignments, and types of activities.
- Description of volunteer stations and specific types of assignments currently available.
- Special needs of persons to be served by volunteers.
- Volunteer benefits and responsibilities.

- Professional supervision available.
- Transportation arrangements available.
- Follow-up support, recognition activities, and newsletter offered by RSVP.
- Whether the applicant is confident that he or she is able to perform available assignments with, or without, reasonable accommodations.

8.3.2 National Service Criminal History Checks

It is strongly recommended, though not required by CNCS, that sponsors establish policies to ensure that national service criminal history checks are performed for RSVP volunteer candidates who will have contact on a recurring basis with children, frail adults, persons with disabilities or other potentially vulnerable individuals. Name checks of volunteers can be performed at the, *National Sex Offender Public Website*, maintained by the U.S. Department of Justice. A useful resource on conducting background checks for both volunteers and staff is the *Staff Screening Tool Kit (Third Edition)* developed by the Nonprofit Risk Management Center, available for download. For more information see *National Service Criminal Checks Resources*.

8.4 ENROLLMENT OF RSVP VOLUNTEERS

Once the introductory process is completed, the project formally enrolls the RSVP applicant into the program through the completion of an enrollment form. (See **Appendix 2** for a sample RSVP volunteer enrollment form.) Volunteer stations do not enroll volunteers.

The new RSVP volunteer must sign and date the enrollment form, which should include designation of a beneficiary for insurance purposes.

RSVP Volunteers are responsible for updating their enrollment records whenever the pertinent information changes. (See **Appendix 7** for a sample Volunteer Update Form.) Periodically projects should provide opportunities for volunteers to review and update their record. Sponsors are responsible for developing policies and procedures regarding signatures on volunteer forms if alternate forms of submission are to be used, i.e., on-line enrollment forms, or other methods such as fax, scan and email.

8.5 ORIENTATION AND TRAINING OF RSVP VOLUNTEERS

8.5.1 Options for Orientation and Training

Projects should work with volunteer stations, to the extent possible, on the development, delivery and documentation of pre-service orientation for RSVP volunteers. Many projects have found that a combination of a formal orientation program and hands-on experience with volunteer stations works well. This gives greater meaning to the orientation and enhances adjustment to assignments. Locally prepared volunteer handbooks have been found to be useful in providing information to volunteers concerning RSVP, the sponsor, the advisory council, meal and travel reimbursements, prohibited activities and special limitations, appeal procedures, and other pertinent local project policies and procedures. Orientations may be enhanced by inviting representatives of other community service agencies and volunteer station to speak about their programs and the importance of volunteers' contributions.

Pre-Service Orientation Goals

Suggested goals of pre-service orientation include:

- Introduce the RSVP volunteers to RSVP, the sponsor, and CNCS.
- Prohibited activities, including the Hatch Act.
- Provide information on project policies, time sheets, appeal procedures, insurance, and other administrative details.
- Acquaint volunteers with project, volunteer station, and sponsor staff, and other RSVP volunteers.
- Give RSVP volunteers the opportunity to visit and become acquainted with their volunteer stations.
- Provide new RSVP volunteers with information about available community services related to their assignments.
- Where appropriate provide training on working with vulnerable populations

8.5.2 Transportation Expenses for Training

As needed and as funds are available, transportation can be arranged or reimbursed for RSVP volunteers between their homes and places where formal orientation programs are held.

8.6 PLACEMENT OF RSVP VOLUNTEERS

8.6.1 Local Placements

Senior volunteers should be placed in their own communities when feasible, and the need for transportation should be minimized as much as possible.

8.6.2 Volunteer Station Requirement

Volunteer assignments must be placed with volunteer stations or the sponsor serving as the volunteer station, as outlined in Chapter 6.

8.6.3 Placement of Volunteers with Memberships in Voluntary Service Organizations

Potential or current RSVP volunteers who have memberships in organizations that provide voluntary services (e.g. religious organizations, senior centers, hospital auxiliaries, etc.) should not be assigned, as RSVP volunteers, to perform RSVP activities that relate to those voluntary services. RSVP Volunteers should not be placed with organizations with which they are otherwise affiliated to perform RSVP activities that are the ongoing responsibilities of their membership with that organization. However, these volunteers may be assigned to activities at those organizations that differ in nature from their current activities or those required for membership.

8.6.4 Service to Relatives

Assignments involving service to relatives are not precluded for RSVP volunteers. However, projects should exercise good judgment, taking into account local customs and practices and avoiding the appearance of favoritism.

8.7 VOLUNTEER INACTIVITY AND SEPARATION

Sponsoring organizations should have a written policy that defines when a volunteer is deemed inactive. Volunteers who do not serve on a regular basis or intensively on short-term assignments, such as at special events or projects, may become classified as inactive based on the sponsor's written policy. Only active volunteers should be included in reporting of volunteer data to CNCS.

Sponsors are encouraged to work with their RSVP advisory council in establishing written policies and procedures covering volunteer separation and appeals. An RSVP sponsor may separate an RSVP volunteer for cause, including, but not limited to, extensive or unauthorized absences, misconduct, or inability to perform assignments or accept supervision, in accordance with the sponsor's policies. Appeals for adverse actions are also subject to the sponsor's policies. [45 CFR 2553.52]

8.8 EFFECTIVE PRACTICES IN MANAGING RSVP VOLUNTEERS

I. Effective Practices to Ensure Satisfaction among RSVP Volunteers in Their Service to the Community

The project builds a spirit of commitment among the volunteers by:

A. Ensuring that RSVP volunteers have opportunities to express their concerns, interests, and observations about the project to the staff of the project and the volunteer station;

B. Involving RSVP volunteers in the operation and appraisal of assignments and project operations;

C. Soliciting comments and/or recommendations from the RSVP volunteers related to their service activities, and incorporating relevant information into the project as applicable;

D. Adopting specific strategies to retain a diverse group of RSVP volunteers; and

E. Identifying and promptly addressing any issues or problems that impact the retention of RSVP volunteers from a broad range of backgrounds.

II. Effective Practices to Help RSVP Volunteers Develop Their Capacity to be Community Leaders and Spokespersons

The project:

A. Encourages the volunteers to recognize and take pride in the value of their service to the community;

B. Provides RSVP volunteers opportunities to serve in leadership roles and develop leadership skills that enhance their personal lives and the project, such as serving as volunteer leaders or on the Community Advisory Group;

C. Provides opportunities for RSVP volunteers to facilitate training with other RSVP volunteers using a standard training format with learning objectives as ways to measure progress;

D. Involves RSVP volunteers in promoting the project to the community, such as through media appearances; and

E. Acknowledges and values the strengths and skills of RSVP volunteers through ensuring that assignments are challenging and match the RSVP volunteers' interests and abilities.

III. Effective Practices for Acknowledging the Contributions of RSVP Volunteers

The sponsor and project director:

A. Plan and implement individual and group recognition activities;

B. Ensure that volunteer stations regularly recognize RSVP volunteers as contributors to the stations' ability to deliver services;

C. Provide at least one annual recognition event for RSVP volunteers which has significant community support and involvement;

D. Recognize, document, and publicize outstanding RSVP volunteer achievement;

E. Consider collaborating with other area Senior Corps programs on recognition efforts; and

F. Consider non-traditional forms of recognition, especially for culturally diverse and Boomer volunteers.

9 RSVP VOLUNTEER COST REIMBURSEMENTS

RSVP volunteers are provided with cost reimbursements and other benefits. Within the limits of a project's approved budget, and in accordance with 45 CFR 2553.43 and any written Senior Corps policy guidance to projects, volunteers are provided transportation, meals, accident and liability insurance, and recognition activities. Cost reimbursements are budgeted as "Volunteer Expenses," and the two terms may be used interchangeably.

9.1 ADMINISTRATION OF COST REIMBURSEMENTS

Sponsors should establish written cost reimbursement policies and procedures and provide these to each volunteer.

9.1.1 Assignment-Related Expenses

Project funds may be used to reimburse volunteers for expenses, including transportation costs, incurred while performing their volunteer assignments, provided that these expenses are described in the Memorandum of Understanding with the volunteer station and there are sufficient funds available to cover these expenses and meet all other requirements identified in the Notice of Grant Award. [45 CFR 2553.43(e)] Otherwise, such expenses are the responsibility of the volunteer station.

9.1.2 Reimbursement Policies

The amount of reimbursement made to RSVP volunteers is determined by the availability of funds and project's written policy regarding reimbursement of Volunteer Expenses. The procedure and the limits for volunteers to request reimbursement should be identified in volunteer orientation sessions and project service policies.

9.1.3 Non-Reimbursed Volunteer Purchases

Volunteer expense items that are purchased at a volunteer's own expense and not reimbursed by the project to the volunteer are not allowable as contributions to the non-Federal share of the budget. These include transportation to and from their assignments, meals taken during assignments, recognition activities, and recognition items. [45 CFR 2553.73(c)]

9.2 VOLUNTEER COST REIMBURSEMENTS DETAILED

9.2.1 Transportation

1) General Principles and Practices

   a) RSVP volunteers may receive assistance with the cost of transportation to and from volunteer assignments and official project activities, including orientation, training, and recognition events. [45 CFR 2553.43]

   b) It is suggested that the project work with its advisory council to prepare a transportation plan. Such a plan should be sound and reasonable, based on lowest-cost transportation modes, and include scheduling, modes of transportation, criteria for reimbursement, mileage rates, and patterns of transportation.

c) Consideration should be given to volunteers who do not own cars or may prefer not to drive and can only participate in the program when other arrangements and modes of transportation are developed.

d) Transportation should be considered when deciding where volunteers are assigned. Convenient and less costly transportation is promoted when assignments are developed in areas close to where RSVP volunteers live.

e) It is important to consider both costs and convenience, as well as volunteer service schedules, in developing a cost-effective travel solution.

f) Transportation provided by volunteers that has not been reimbursed to the volunteer cannot be used as a local contribution to the project budget.

g) Parking fees for volunteers having to park at a volunteer station or at an official RSVP function may be budgeted. Parking costs are allowable as a local in-kind contribution only if they are normally charged.

h) RSVP volunteers and volunteer station staff are required to sign a statement certifying that transportation costs to be reimbursed to the volunteer were in conjunction with volunteer service and to provide details of the reimbursement. Vouchers are subject to review for compliance monitoring and CNCS audit purposes.

i) Projects may incorporate volunteer expense claims on the timesheet form. Costs must be verified by signatures of the volunteer, the volunteer station supervisor, and designated RSVP staff. (See **Appendix 3** for a sample Volunteer Timesheet and Mileage Request form.)

2) Reimbursement for Volunteers' Transportation

a) Volunteer Drivers

Reimbursement of RSVP volunteers who drive their own cars is based on a cost-per-mile rate set by the sponsor via written policy. Volunteers are reimbursed for actual mileage within the limits of available funds and local project reimbursement policy. Volunteers cannot be reimbursed in excess of actual costs, or on a per capita basis, for transporting other volunteers. (See **Appendix 3** for a sample Volunteer Timesheet and Mileage Request form.)

Mileage reimbursement directly to an RSVP volunteer from a volunteer station for transportation from the volunteer's home to the place of assignment and return home is acceptable as local support of the RSVP project. Project files should include verification of this contribution for review for compliance monitoring and CNCS audit purposes.

Mileage reimbursement to RSVP volunteers from volunteer stations for providing transportation while on volunteer assignments cannot be used as local support of the RSVP project. RSVP cannot accept responsibility for the costs of community service provided by volunteer stations and, therefore, cannot be credited for the value of those costs to be used as local budget support.

b) Car Pool Drivers

Drivers of car pools receive reimbursement for actual mileage based on a cost-per-mile rate. Passengers do not receive reimbursement.

c) Public Transportation Users

Sponsors should establish procedures, such as a voucher system, for reimbursing volunteers for public transportation expenses, including subways, buses, and other public conveyances. Reimbursements must be based on documentation by the volunteer of actual costs incurred for project-related transportation expenses.

d) Other Transportation Reimbursement Considerations

The purchase cost, operation, and maintenance of vans, mini-buses, or station wagons may be budgeted only if they provide the most flexible and economical transportation available.

Project vehicle costs, vehicle driver's salary and fringe benefits, and vehicle insurance are budgeted as travel costs under volunteer expenses in the RSVP project grant application.

Contracted transportation, if it is the most flexible and economical mode, may be budgeted for volunteers.

Volunteers who do not incur travel expenses (e.g., those who walk to assignments, ride on free public transportation, or are passengers in carpools) do not receive reimbursement.

9.2.2 Meals

Within the limits of the project's approved budget and project written policy, RSVP volunteers receive assistance with the cost of meals while on assignment. [45 CFR 2553.43(b)] Funds for this volunteer benefit may be limited, but it should be provided when possible.

1) Meal Arrangements

Project directors should make special efforts to reach an understanding with volunteer stations to provide meals for RSVP volunteers. These meals may be used as local support in the budget, providing there is sufficient documentation. RSVP volunteers over 60 are eligible for meals at congregate meal sites funded under Title III of the Older Americans Act. Grantees may not count Title III funds and non-Federal funds used to match Title III funds to meet the required CNCS non-Federal cost share. However, grantees may count meals provided to volunteers paid for by other than Title III, or Title III matching funds, as a local contribution. [2 CFR 200.306 (b)]

2) Reimbursement to Volunteers

The amount of reimbursement to volunteers for meals is normally based on actual expenses, consistent with costing procedures developed by the sponsor rather than a flat daily rate. However, reimbursement of “brown-bag” lunches prepared by RSVP volunteers may be based on a flat rate established by the sponsor. The basis for the rate should be included in the grant application budget narrative. Any changes made during the budget period require prior approval of CNCS. RSVP volunteers and volunteer station staff are required to sign a statement certifying that meals to be reimbursed to the volunteer were taken in conjunction with volunteer service

and provide details of the reimbursement. Vouchers must be approved by RSVP staff and they are subject to review for compliance monitoring and CNCS audit purposes.

9.2.3 Insurance

The program regulations require RSVP volunteers to be provided with accident, personal liability, and, when appropriate, excess automobile liability insurance. [45 CFR 2553.43(d)] The minimum levels of this insurance are specified by the CNCS, and may be subject to change from time to time. See Senior Corps Insurance Requirements up-to-date information.

The insurance coverage must be in excess of and noncontributing to any other valid and collectible insurance the volunteers have. In other words, the accident and excess automobile liability coverage are intended to provide higher levels of insurance for volunteers, starting where other insurance coverage for them stops. They are excess, not primary insurance.

This is true, too, for personal liability; but volunteers are often not covered by personal liability insurance, in which case the CNCS-specified personal liability insurance becomes primary insurance with no deductible.

1) Accident Insurance

a) Accident insurance must cover RSVP volunteers for personal injury during travel between their homes and places of assignment, during their volunteer service, during meal periods while serving as a volunteer, and while attending project-sponsored activities, such as recognition activities, orientation, and RSVP advisory council meetings.

Protection must be provided against claims in excess of any benefits or services for medical care or treatment available to the volunteer from other sources, including:

1. Health insurance coverage.
2. Other hospital or medical service plans.
3. Any coverage under labor-management trusted plans, union-welfare plans, employer organization plans, or employee-benefit organization plans.
4. Coverage under any governmental program or provided by any statute.

RSVP Volunteers and Workers Compensation

RSVP volunteers *are not* employees and *are not* covered by Federal or state workers compensation insurance.

45 CFR 2553.44

b) When benefits are approved in the form of services rather than cash payments, the reasonable cash value of each service rendered must be considered in determining the applicability of this provision. The benefits payable must include the benefits that would have been payable had a claim been duly made. The benefits payable must be reduced to the extent necessary so that the sum of such reduced benefits and all the benefits provided for by any other plan must not exceed the volunteer's total expenses.

c) The sponsor must provide RSVP volunteers with the following accident insurance coverage:

1. $50,000 or more for accidental medical expenses.

2. $50 for repair or replacement of damaged eyeglass frames and $50 for replacement of broken prescription eyeglass lenses or contact lenses.
3. $500 for repair of dentures; $500 per tooth for treatment of injury to natural teeth, limited to a total of $900.
4. $2,500 for accidental death or dismemberment.

2) Personal Liability Insurance

a) Protection must be provided against claims in excess of protection provided by other insurance. The sponsor must provide third-party protection for volunteers against injury or property damage claims arising out of their volunteer service activities. For each sponsoring organization, the amount of protection must be $l,000,000 for each occurrence of personal injury or property damage and must be in excess of any other valid and collectible insurance, and $3,000,000 annual aggregate.

Personal Liability vs. Professional Malpractice Insurance

Personal liability insurance does not include, nor is it a substitute for, malpractice insurance which some volunteer stations need for their professional staff and for some volunteers who assist professionals or serve in professional capacities.

3) Excess Automobile Liability Insurance

a) To avoid a gap in coverage between that provided by the RSVP volunteer's personal vehicle insurance and liability claims in excess of that coverage, the sponsor must provide Excess Automobile Liability Insurance coverage of not less than $500,000 each accident for bodily injury and/or property damage.

Excess Automobile Liability Insurance

Excess automobile liability insurance is required only for RSVP volunteers who drive their own cars to and from their place of assignment. **Verify that volunteer drivers have valid licenses and basic liability**

b) The sponsor will provide protection against claims in excess of the greater of either:
   1. The liability insurance volunteers carry on their own automobiles; or
   2. The limits of the applicable state Motor Vehicle Financial Responsibility Law; or
   3. In the absence of a state financial responsibility law, $50,000.

c) NOTE: Excess automobile liability insurance is required only for RSVP volunteers who drive their own cars to and from their place of assignment. It is recommended that projects verify that volunteer drivers have valid licenses and basic liability insurance.

4) Liability Insurance on Personal Vehicles of Volunteers

a) This insurance is a volunteer's personal expense and is not reimbursable to the volunteer by the project. RSVP volunteers who use their personal vehicles to drive from home to their place of assignment or in connection with project-related activities must keep their automobile liability insurance in effect for their own protection.

1. The volunteer's personal vehicle liability insurance must equal or exceed:
2. The limits of the state Motor Vehicle Financial Responsibility Law; or
3. In the absence of a state financial responsibility law, $50,000 for each accident.

9.2.4 Uniforms or Smocks

When volunteer stations require RSVP volunteers to wear special uniforms or smocks, the cost of uniforms and laundering are an allowable project cost when these expenses are described in the Memorandum of Understanding with the volunteer station, sufficient funds are available to cover these expenses, and all other requirements identified in the Notice of Grant Award are met. Otherwise, volunteer stations are responsible for such costs.

9.2.5 Clothing and Branded Gear

Many Senior Corps grantees want to use clothing to highlight the volunteers' participation in the Senior Corps program. Items like clothing, bags, hats, or other gear with the Senior Corps program names and logos that are not required by the project or volunteer station are considered recognition of service and should be categorized in the recognition budget line item rather than the uniform line item.

9.2.6 Recognition

Appropriate recognition for service is to be provided for RSVP volunteers. [45 CFR 2553.43(c)]

Recognition covers a wide range of potential costs; any costs charged to this direct benefit to the volunteer must be in accordance with the applicable OMB cost principles and using sound business practices. Any costs charged to recognition should be reasonable and prudent, properly valued, and consistent with the sponsoring organizational accounting practices. Consideration should also be given to the appropriateness of the expenditure. (See **Appendix 14** for Guidance for Recognition Costs.)

1) At least annually the RSVP sponsor plans and arranges for formal public recognition of RSVP volunteers for their service to the community. Sponsors may recognize local individuals and agencies or organizations for significant activities that support project goals.

2) CNCS does not supply volunteer recognition materials nor does it require specific recognition materials.

3) Informal recognition ought to be ongoing, such as listening to and acting upon recommendations by RSVP volunteers, offering honest praise, and providing assignments that are increasingly satisfying.

4) Recognition events may consist of special ceremonies, teas, breakfasts, luncheons, and recreational outings at which pins and certificates for stipulated terms of service are awarded.

5) The RSVP advisory council and volunteer stations are expected to participate in recognition activities. Community contributions in support of recognition activities can enhance the quality of the events. Contributions need not be monetary. Donated space, food, decorations, and transportation should be encouraged. Proper documentation is required to use donations as local support.

6) To emphasize the importance of the occasion, CNCS field and headquarters staff, as well as city and county officials and officers of local organizations may be invited to recognition events.

7) Entertainment expenses (e.g. bands, alcohol) are unallowable expenses and cannot be charged to the federal or non-federal share of the budget.

9.3 LEGAL REPRESENTATION

Legal counsel may be retained, and counsel fees, court costs, bail, and other expenses incidental to the defense of an RSVP volunteer may be paid, in a criminal, civil, or administrative proceeding when such a proceeding arises directly out of performance of the RSVP volunteer's activities. 45 CFR Part 1220 sets forth the circumstances under which CNCS may reimburse for such expenses. Consult the CNCS State Office for guidance.

10 GRANTS MANAGEMENT

10.1 INTRODUCTION TO GRANTS MANAGEMENT

10.1.1 Basic Requirements

Sponsors must manage grants awarded to them in accordance with all applicable RSVP Program Regulations (45 CFR2553), the Notice of Grant Award (NGA) as well as the Terms and Conditions for CNCS grants. Contact the appropriate CNCS State Office or grant official at CNCS's Field Financial Management Center for additional technical assistance on fiscal management of an RSVP grant.

Financial Management Training

An on-line course, "Key Concepts of Financial Management," which can be accessed at The Knowledge Network: Online Courses, provides a basic introduction to grants management considerations applicable to all Corporation grantees.

Uniform Administrative Requirements	Standards of consistency and uniformity of grants to various institutions	2 CFR Subtitle A Chapter II 200.300 to 200.345
Cost Principles	Principles for determining the costs of grants and other agreements with non-profit organizations	2 CFR Subtitle A Chapter II 200.400 to 200.475
Audits	Standards for obtaining consistency and uniformity among Federal agencies for the audits of states, local governments, and non-profit organizations expending Federal awards.	2 CFR Subtitle A Chapter II 200.500 – 200.520

In accordance with Uniform Administrative Requirements, 2 CFR 200.302, Non-Federal Entities (NFE) that receive RSVP grant funds are required have financial management systems that provide for the following:

- Identification, in its accounts, of all federal awards received and expended and the federal programs under which they were received.

- Accurate, current, and complete disclosure of the financial results of each federal award or program in accordance with the reporting requirements set forth in 2 CFR 200.327 - Financial reporting and 2 CFR 200.328 - Monitoring and reporting program performance.
- Records that identify adequately the source and application of funds for federally-funded activities
- Effective control over, and accountability for, all funds, property, and other assets.
- Comparison of expenditures with budget amounts for each federal award.
- Written procedures to implement the requirements of 2 CFR 200.305 - Payment.
- Written procedures for determining the allowability of costs in accordance with 2 CFR Part 200 Subpart E—Cost Principles and the terms and conditions of the federal award.

10.1.2 Cost Control and Budget Monitoring

Project support provided under an RSVP grant must be furnished at the lowest possible cost consistent with the project's effective operation of the project as described in the RSVP Program Regulations. (45 CFR 2553.73(b)). Project directors should work with the sponsor's fiscal staff and regularly compare the budget to actual costs.

10.1.3 Budgeting Costs

Project costs for which grant funds are budgeted must be reasonable and justified as being essential to project operation. "Grant funds" refers to both the CNCS share and the required non-federal share of the grant.

1) Specific costs are either allowable or unallowable. Only allowable costs may be included in the CNCS share or the grantee share of the budget. Only amounts approved by CNCS may be expended.

2) Notices of Grant Award, as well as the RSVP Program Regulations (45 CFR 2553.73), incorporate the OMB "OMB Guidance for Grants and Agreements" found at 2 CFR Chapter I, and OMB "OMB Cost Principles" found at 2 CFR Part 200, Subpart E. OMB Cost Principles distinguish between costs that are allowable and costs that are not allowable for all federal grants. Grantees should review 2 CFR Chapters I and II, and refer to specific regulations within 2 CFR Chapters I and II as needed. OMB Cost Principles apply to funds included in the grant as part of the CNCS share and also apply to the required non-federal share. Conversely, the OMB Cost Principles do not apply to funds that are not included in the grant as part of the CNCS share or are not included in the required non-federal share. Also, the OMB Guidance for Grants and Agreements, does not apply to funds budgeted as Excess non-federal or to other sponsor resources outside the grant. Therefore it is recommended that all allowable costs be budgeted in the "CNCS Share" or "Non-CNCS" share of the budget.

Terminology Note

In the electronic grants system, "grantee share" and "applicant share", are used to refer to the required non-federal share of the grant.

"Local share," as used in the program regulations, also refers to the required non-federal share.

3) Additional requirements in the RSVP Program Regulations also determine cost allowability. Below are listed several cost items about which questions commonly are raised. Questions regarding costs not included in the listing below should be referred to the appropriate CNCS State Office or grant official at the Field Financial Management Center (FFMC).

   a) Equipment or supplies for volunteers on assignment are not allowable, unless these expenses are described in the Memorandum of Understanding with the volunteer station and there are sufficient funds available to cover these expenses and meet all other requirements identified in the Notice of Grant Award. [45 CFR 2553.43 (e)]

   b) The following insurance costs are not allowable:

      1. Public liability insurance for sponsors (except for space that the RSVP sponsor occupies that is separate from the main sponsor offices).

      2. Primary insurance for volunteers' or project staff's personal vehicles.

      3. Health insurance for volunteers.

   c) Costs for recruitment of personnel and volunteers for the award are allowable, including costs of recruiting hard-to-reach volunteers, such as those belonging to ethnic groups that may not be reachable by standard methods of recruitment.

   d) Only compensation paid to staff who are engaged in activities that directly support the performance of the award is allowable. Sponsors should familiarize themselves with proper documentation requirements in accordance with the OMB Cost Principles (2 CFR § 200.430 "Compensation – personal services").

   e) When project staff are employed in the operation of two or more Senior Corps projects, in order to be allowable, their salaries and fringe benefits must be budgeted on a prorated basis in each project's budget, based on the allocation of time to each project. Grantees must document actual time spent on each grant, and only actual time should be reported.

   f) The costs of national service criminal history checks on Senior Corps volunteers or prospective Senior Corps volunteers are allowable. However, wherever possible, these costs should be paid by volunteer stations. When paid by the project, such costs should be budgeted as Volunteer Support Expenses because these costs are program operating expenses.

10.1.4 Direct and Indirect Costs

1) Definitions

   Direct costs are costs that are readily associated with a particular budget line item while indirect costs are costs that are incurred for common or joint objectives and are not readily associated with a particular budget line item. Federally approved indirect cost rates are generally expressed as a percentage of the direct costs.

2) Cognizant Federal Agency

   A "cognizant federal agency" is an agency appointed by the Office of Management and Budget that is responsible for negotiating and approving the indirect cost rates of a grantee on behalf of all federal agencies. Typically the "cognizant" agency is the federal agency from which a grantee

receives the majority of its federal support in the form of Direct Grants. When an organization that has no cognizant federal agency proposes indirect costs in a grant application, CNCS may assume the role of providing oversight.

3) Process for Establishing an Indirect Cost Rate
When a grantee has no cognizant federal agency:

   a) The grantee contacts the appropriate CNCS State Office or grant official and obtains "Instructions for Obtaining a Federal Indirect Cost Rate" and then submits an indirect cost rate proposal to CNCS in accordance with the regulations in 2 CFR Part 200, Subpart E.

   b) The agency contracted by CNCS reviews the indirect cost rate proposal against the applicable OMB guidance and makes a determination of the applicable rate. CNCS uses the services of the Division of Cost Allocation (DCA) at the Department of Health and Human Services (DHHS) to negotiate and establish indirect cost rates with its grantees.

4) De minimis rate of Modified Total Direct Costs
Any non-Federal entity that has **never** received a negotiated indirect cost rate, except for those non-Federal entities described in 2 CFR Appendix VII to Part 200—States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b, may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. Please contact your grants official for more information.

5) Limitation on Indirect Costs
The base for indirect costs in Senior Corps programs is limited to Volunteer **Support** Expenses (these are the administrative expenses). Volunteer Expenses (these are the cost reimbursements to the volunteer) are not included in the base for indirect cost rates. Reasonable payroll expenses may be budgeted as direct costs for the payment of volunteer cost reimbursements.

10.2 ROLE OF THE CNCS GRANT OFFICIAL

The acceptance of an assistance award from CNCS creates a legal duty on the part of the grantee to use the available funds or resources in accordance with the terms and conditions of the assistance agreement. An obligation exists on behalf of CNCS to fund the grantee in accordance with the assistance award.

The Grant Official for a given grant is a member of the CNCS's Grants Management staff based at the Field Financial Management Center (FFMC). The Grant Official is the representative of CNCS in financial, budgetary, and administrative matters of Senior Corps. The Grant Official has overall responsibility for the receipt, approval and monitoring of all required financial documents from CNCS grant programs. Only the Grant Official, acting as the agent of the federal government, has the authority to:

- Award a grant.
- Modify the terms of a grant.
- Issue written instructions to the grantee to start or stop work.
- Execute any action which will result in increasing or decreasing the cost to the government.

- Extend or curtail the budget or project period cited in the applicable Notice of Grant Award (NGA).
- In conjunction with the FFMC Director, or his/her designee, propose Management Decisions upon completion of an audit.
- Close-out a grant.

The Grant Official is ultimately responsible for determining the allowability and reasonableness of grant costs proposed or incurred, except in certain circumstances related to the resolution of audit findings. The Program Officer named in the NGA is the representative of the Grant Official for the purpose of monitoring the programmatic performance of the grant and advises the Grant Official on all activities that may adversely affect performance. The Grant Official may accompany and work with the program officer to conduct financial monitoring of the grant. However, grantees should first consult with the Program Officer prior to seeking approvals where the Grant Official has the ultimate approval authority.

10.3 BUDGET MANAGEMENT

10.3.1 Budget Categories

1) Costs are separated according to whether the proposed source of project support is federal or non-federal. In context of the budget, "federal" means "CNCS," and "non-federal" means "sources other than CNCS" including certain other federal agencies, as authorized by law or by the source of funds.

   a) "Required non-federal." (Also known as "Grantee Share" on the budget). This is the part of the total non-federal budget used to meet the non-federal share requirement (10 percent of the **total cost set forth in the budget** in the first year, 20 percent in the second year, and 30 percent in the third and succeeding years). Any additional amount that the grantee wants to include as part of the required non-federal share of the total project cost should also be under this category. Costs included under this category must meet all the cost requirements established by CNCS.

   b) "Excess non-federal." This is the part of the total non-federal budget that is in excess of the non-federal share requirement. This is distinguished from the Excess Column on the budget. The two terms are not synonymous. The "Excess non-federal" is defined as funds over the required share budgeted in the "Grantee Share" column of the budget. Inclusion of excess non-federal costs is not required. If excess non-federal funds are budgeted, they must support the purpose of the project, consistent with the Domestic Volunteer Service Act of 1973. It is generally recommended that as long as costs are allowable, sponsors should budget those costs as part of the required non-federal share so they can be easily reported on the project's Federal Financial Report.

2) Allowable costs separated by source are further differentiated by purpose, that is, whether the funds are to cover costs of Volunteer Expenses or Volunteer Support Expenses.

   a) "Volunteer Expenses" is a limited category which includes only the following volunteer costs:
      - Transportation

Terminology Note

In the context of Senior Corps project budgeting, the term "Volunteer Expenses is sometimes referred to as "cost reimbursements" or" "Volunteer Benefits".

- Meals
- Insurance
- Recognition Items and Activities

b) "Volunteer Support Expenses" includes all costs other than those included above in "Volunteer Expenses." including volunteer training costs.

10.3.2 Budget Criteria

1) The RSVP sponsor is expected to supplement the CNCS grant with other budget support. The sponsor must raise the amount of non-federal support described in the project funding requirements located in RSVP Program Regulations (45 CFR 2553).

2) A CNCS grant may be awarded to fund up to 90 percent of the total project cost in the first year, 80 percent in the second year, and 70 percent in the third and succeeding years.

   a) Project support from non-CNCS sources may be in cash or in-kind contributions.

   b) CNCS-approved in-kind contributions may constitute part or all of the non-federal share requirement. Requirements for in-kind contributions are found in 2 CFR Chapter II Subpart D Section 200.306.

3) CNCS may allow exceptions to the non-federal share requirement required (at least 10 percent of the total cost in the first year, at least 20 percent in the second year and at least 30 percent in the third and succeeding years), in cases of demonstrated need such as:

   a) Initial difficulties in the development of non-federal funding sources during the first three years of operations.
   b) An economic downturn, the occurrence of a natural disaster, or similar events in the service area that severely restrict or reduce sources of non-Federal support.
   c) The unexpected discontinuation of non-federal support from one or more sources that a project has relied on for a period of years.

4) A sponsor proposing to contribute less than the A sponsor proposing to contribute less than the required non-Federal share must provide CNCS with an acceptable written justification for the lower level of support. The justification is submitted for consideration through the CNCS State Program Director. The justification for the waiver should:

   a) be requested prior to the grant award;
   b) include the grant period the waiver requested for (e.g. 1st year, 2nd year all years) and;

Prohibition on Compensation for Services

The authorizing statute for RSVP– the Domestic Volunteer Service Act of 1973 (DVSA) – prohibits charging RSVP beneficiaries for volunteer services. This prohibition is restated in the "Compensation for Services" provision in the RSVP Program Regulations and applies not only to the client but also to the client's legal guardian, family members, or friends.

This provision prohibits soliciting donations from beneficiaries of the services of RSVP volunteers or any other actions by the project that could create the impression that services of volunteers are linked in any way to financial support from a beneficiary. More information on prohibition on compensation for services can be found in Chapter 2 of this handbook

c) detail how much of the match needs to be waived (e.g.5% or all of the match).

5) Non-federal support already committed to meet non-federal support requirements of any other federally-assisted project or program may not be budgeted as part of the non-federal support for RSVP. [2 CFR Chapter II, Subpart D, Section 200.306]

6) All non-CNCS funding expended for allowable costs will be counted as local support and as a contribution to the sponsor's local support with the following exceptions:

   a) CNCS grant awards are made for a specified dollar amount, and if the sponsor obligates or expends CNCS funds for costs that exceed the amount of the CNCS award, the costs are not allowable.

   b) Project costs for which the required non-federal funds are budgeted will be acceptable if: a) costs are allowable; b) are reasonable in comparison to other costs; c) benefit the project's operational effectiveness; and d) contribute to achievement of RSVP program goals and objectives.

   c) Funds from federal agencies other than CNCS, including federally funded in-kind resources, may not be budgeted as part of the sponsor's local support contribution, except those funds specifically authorized by law. The burden is on the sponsor to document for CNCS that any funds or in-kind resources from another federal agency are authorized to be used to make up the non-federal share of a grant from CNCS.

   d) Direct benefit items, such as transportation, meals, and recognition items which are purchased at the volunteer's own expense and not reimbursed, are not allowable as contributions to the non-federal share of the budget.

10.3.3 Budget Non-Compliance

1) Required Non-Federal Share

   If a sponsor has failed over the multi-year project period to meet the at least 10, at least 20, or at least 30 percent non-federal share requirement, the sponsor must take one of the two following actions:

   a) Reimburse CNCS the full amount of the deficiency***, but only if so directed by the Grant Official.***

   b) Submit a written request for a waiver to the appropriate CNCS State Program Director. This written request must be submitted with the final Federal Financial Report (FFR) and must include:
      1. Why the requirement was not met.
      2. What specific attempts were made to achieve the required non-federal percentage?
      3. A plan to provide the required non-federal share in the current grant period, assuming the sponsor has received a new multi-year award.

2) Excess Resources

Sponsors are not penalized for failure to achieve the budgeted amount of excess support. Failure to meet the total budget, including the excess, will be examined in light of the overall effect on the project's accomplishment of its goals and objectives.

10.4 GRANT AMENDMENTS AND REBUDGETING

During implementation of a grant, a grantee may decide to make adjustments to the approved application. All grant amendments and budget changes should be made and documented into the system of record, but the following changes require prior CNCS approval and amendment of the NGA:

- A change in the scope of service or a substantial change in goals or objectives.
- A change in key personnel specified in the application or federal award.
- A request for a project director at less than full time.
- The creation of a new budget line item where there will be a need for additional funds.
- The transfer of funds budgeted for direct costs to indirect costs.
- The request of a match waiver.
- Extension or reduction of the budget or performance budget period.

If cumulative changes exceed 10% of the total budget the grantee must request prior approval to submit an amendment. CNCS, as the federal awarding agency, cannot permit a transfer that would cause any federal appropriation to be used for purposes other than those consistent with the appropriation. [2 CFR Chapter II, Subpart D, Section 200.308] Grantees should consult with your program officer regarding budget changes, even if pre-approval is not required.

10.5 ACCESSING GRANT FUNDS AND MANAGING ADVANCES

All Senior Corps grantees are paid through the Department of Health and Human Services (HHS) Payment Management Services, abbreviated as PMS. Senior Corps grantees must establish an account with the HHS/PMS that allows them to draw down funds. When a grant is awarded in the electronic grants system, the grant is recorded in CNCS's accounting system and transmitted to PMS which maintains an account for each grant. Grantees draw funds from that account.

10.5.1 Steps in Setting up a PMS account

1) Grantees without a PMS account should contact the appropriate Grant Official or CSO. The Grant Official or CSO will send the grantee instructions informing the grantee that it needs to fill out an 1199A Direct Deposit Form, which records the agreement of the grantee and its financial institution. The grantee designates the bank that will receive funds for the grantee. Also enclosed in the instruction letter are the other forms and documents the grantee needs to complete and establish their account.

2) The grantee forwards the completed forms to the appropriate offices as outlined in the instructions.

3) HHS notifies the CNCS of the grantee's assigned suffix and PIN through e-mail, and simultaneously, sends a certified letter to the grantee with the same information.

10.5.2 How grantees request funds through PMS SMARTLINK

Grantees use SMARTLINK to access funds. SMARTLINK is an automated "next day" direct deposit system for the Federal government. Recipients assigned to SMARTLINK use a PC to access the PMS SMARTLINK Request For Funds application, enter their account and drawdown information (e.g. account number and amount requested), and receive a status message detailing their transaction. The transaction is completed online, and funds are direct-deposited into the recipient's account on the next business day.

Funds should only be drawn down for immediate cash needs or on a reimbursement basis. Grantees should develop written policies and procedures for drawdowns so that they are done on a consistent basis and a clear audit trail exists. 2 CFR Chapter II, Subpart D, Section 200.305

At any time, CNCS Grant Officials can log on to the PMS directly or view authorized, disbursed, and advanced amounts in the electronic grants system.

Grantees may:

- Draw down funds on a reimbursement basis;
- Draw down funds that they will be using in the immediate future, usually considered to be within three days of receipt; or
- Maintain advance payment of federal funds in interest bearing accounts unless the following apply: (See "Interest Earned on Advances" below.)
    a. The grantee receives less than $120,000 in Federal awards annually.
    b. The account would not earn interest in excess of $500 per year.
    c. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
    d. A banking system prohibits or precludes interest bearing accounts.
- Interest earned amounts up to $500 per year may be retained by the non-Federal entity for administrative expense. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment.

Please review the help and training for grantees using the PMS.

10.5.3 Federal Cash Transactions Report – PSC 272 A

Grantees report on funds by submitting quarterly Federal Cash Transaction Reports (PSC 272 A Report) directly to PMS. The PSC 272 A Report is an overview of the cash status of the account. It contains data provided by PMS to the recipient and the net disbursement amount as calculated by the recipient. The PSC 272 A Report is similar to a checking reconciliation and is used to report the amount of "Cash on Hand". HHS monitors this amount and deducts any cash on hand amount from previous payment requests. At the end of the grant performance period, the SF 425 Federal Financial Report MUST reconcile with the PSC 272 A Report and the amount drawn down. If these three numbers are not identical, the grant cannot be closed.

10.5.4 Interest Earned on Advances

Grantees are required to maintain advances of federal funds not used within 3 days in an interest bearing account. The project will be allowed to retain the first $250.00 of interest per year to cover

administrative expenses. Interest earned above this amount must be remitted annually in a check made payable to the U.S. Treasury, to the Department of Health and Human Services, Division of Payment Management, P.O. Box 6021, Rockville, MD 20852.

The Cash Management Improvement Act and regulations that established this requirement have some exceptions. The major ones that can impact a Senior Corps grantee are as follows:

- State government grantees do not have to follow this requirement unless required to do so by the Department of Treasury Financial Management Service.
- Indian Tribal Governments are also exempt from this requirement.
- The recipient receives less than $120,000.00 per year from all federal sources.
- The best reasonable available interest bearing account would not have been expected to earn in excess of $250.00 per year on the federal balance.

10.6 SUSPENSION, TERMINATION, AND DENIAL OF REFUNDING

The rules on grant suspension, termination, and denial of refunding procedures are addressed in the RSVP Program Regulations (45 CFR § 2553.31).

10.7 AUDIT REQUIREMENTS

10.7.1 Single Audit

Recipients of federal grant awards are required to have audits performed in accordance with the Single Audit Act Amendments of 1996 (Single Audit Act), as amended. OMB Budget Guidance Audit Requirements, provides guidance on audit requirements pursuant to the Single Audit Act. The Audit Requirements established that grant recipients that expend $750,000 or more of federal funds in a year must have an independent auditor perform a single audit, or a program-specific audit. These audit requirements do not apply to organizations expending less than $750,000 in total federal funds in a given year.

When applicable, a single audit requires the sponsor to have an audit of its entire organization conducted by an independent auditor that essentially determines:

- If the organization's financial statements present its and the program's financial position fairly;
- If the institution has the internal control structure to ensure that the program is managing the award in accordance with the applicable federal laws and regulations; and
- That the program has complied with the applicable laws and regulations that may have a direct and material effect on the program's financial statement.

Federal Audit Clearinghouse:

Audits performed under the Single Audit Act are to be sent electronically to the Federal Audit Clearinghouse.

The Internet Data Entry System (IDES) is the place to submit the single audit reporting package, including form SF-SAC, to the Federal Audit Clearinghouse (FAC). Single audit submission is required under the Single Audit Act and 2 CFR § 200.512.

10.7.2 Other Audits

In the case of sponsors whose total federal funding falls below the $750,000 threshold established by the requirements of OMB Post Federal Award Requirements (2 CFR Chapter II, Part 200, Subpart D), the sponsor's policies apply. Sponsors are expected to follow generally accepted accounting practices. Sponsors must provide copies of any audit report partially or wholly charged to the grant to the CNCS State Office and the grant official. Grantees need to follow applicable federal, state and local requirements for financial reporting and audits for their type of organization.

10.8 CONCLUSION

Familiarize all staff with RSVP Program Regulations, 2 CFR Chapters I and II , specifically OMB Cost Principles and OMB Guidance for Grants and Agreements, to ensure compliance. Keep good documentation that demonstrates that costs are reasonable, necessary, allocable, allowable, and adhere to grant guidelines. Ensure that there is a clear audit trail for all financial reports from accounting system to data submitted. If you have a question, contact your CNCS State Office or Grant Official.

10.9 Effective Practices for Securing Non-CNCS Financial and In-Kind Support

The sponsor:

A. Secures cash or in-kind contributions, amounts that regularly exceed the required non-CNCS support for the project;

B. Develops and maintains a diversified non-Federal funding base from the private sector, the nonprofit community, and state and local government;

C. Has a commitment to secure non-CNCS support for the project which is incorporated into the sponsor's resource development plan;

D. Includes the project as a designated department in annual giving campaigns such as United Way;

E. Demonstrates the project's role as an extension of its core services by directing opportunities, such as grants, specifically to the project;

F. Has an established long range resource development and mobilization program that includes the project as a key program to be supported;

G. Designates a sponsor staff member to help generate the needed support;

H. Actively engages its Board in developing non-Federal resources for the project;

I. Works collaboratively with the project's entity for community participation as dual leaders in mobilizing resources for the project;

J. Keeps project staff informed of the financial status of the project;

K. Makes consistent progress toward expansion of the RSVP project with other funds;

L. Learns from other sponsor's models for building successful partnerships and ways of addressing Senior Corps-specific resource development and mobilization challenges;

10 Tips to Help Avoid Common Audit Findings

Audit findings frequently result from **missing, incomplete, or insufficient documentation** that grant requirements have been met. Following are 10 steps to help avoid the more common audit findings:

1. Make sure current Memorandums of Understanding are on file for all volunteer stations where volunteers are serving.
2. Maintain documentation on file that shows that all enrolled volunteers meet the eligibility requirements (Age, Vehicle Insurance when appropriate, etc.).
3. Ensure there are written assignment descriptions on file for all volunteers.
4. Document that an annual assessment has been performed of the placement of RSVP volunteers to ensure the safety of volunteers and their impact on meeting the needs of the community.
5. Retain supporting source documentation for all volunteer local travel reimbursements.
6. Ensure all grant funded staff have complete national service criminal history check documentation and appropriate time tracking documentation kept on file. Time tracking documents should clearly show that any time spent on non-grant or unallowable activities, such as fund raising or working on other sponsor projects, has been appropriately allocated to other sponsor accounts.
7. Ensure that there is clear documentation of how volunteer service hours were tracked and these records are on file.
8. Document receipt and valuation of all in-kind contributions counted toward the required non-Federal share of the grant.
9. Submit all required reports, such as the Federal Financial Reports, Project Progress Reports and make sure they are on time.
10. Document your organization's policies and procedures, including internal financial controls, in a manual or handbook.

11 REPORTS AND RECORD KEEPING

Reporting and record keeping are essential functions of project management to ensure proper stewardship of public funds and provide information needed to report to the Congress and Executive Branch of the Federal Government on expenditures, project progress, and accomplishments. General reporting and record keeping requirements are discussed in this chapter, but projects should always consult their specific Notice of Grant Award (NGA) Terms and Conditions for the specific requirements of their grant.

11.1 REPORTS

Every recipient of a federal grant is expected to submit reports on the expenditure of all funds identified within the Notice of Grant Award (NGA). The NGA contains standard Terms and Conditions that apply to all grantees, as well as special conditions, as applicable, to a specific grantee. You can print a copy of your NGA from the electronic grants system. Terms and Conditions are available on online. For reporting related to federal grant funds drawn down by the grantee, see **Chapter 10**.

Financial reports provide information to CNCS grant officials and program officers about the total dollars expended. Progress Reports provide information about the service the volunteers are performing with respect to the project plan in the approved grant application. See **Appendix 18** for report due dates

11.1.1 Financial Reports

1) Federal Financial Report (FFR), Standard Form (SF) 425

The Federal Financial Report (FFR) is typically due on a semi-annual basis for each grant as specified in the Terms and Conditions referred to in your NGA. Senior Corps grantees submit FFRs in the CNCS grants management system. The FFR is used to report the following transactions: Federal Cash, Federal Expenditures and Unobligated Balance, Recipient Share, and Program Income

> How Many Federal Financial Reports Are There?
> Projects submit an "FFR" semi-annually to CNCS through the electronic grants management system. Projects also complete an "FFR" in the PMS system regarding draw down of funds. These are different reports and both are required.

Typically, the Terms and Conditions issued with the NGA by CNCS for Senior Corps contain the following conditions regarding Federal Financial Reports:

a) Grantees report expenditures semi-annually from the start date of the grant on the FFR, OMB Form SF-425, by submitting an electronically signed form in the CNCS grants management system within 30 days of the end of each reporting period, as specified in the Terms and Conditions of the NGA.

b) FFRs describe expenses on a cumulative basis over the performance period of the grant (3 years).

c) Projects completing the final year of their grant must submit a final FFR that is cumulative over the entire grant period. This FFR is due 90 days after the close of the grant.

2) Federal Cash Transaction Report, Standard Form 272 (SF 272)

Grantees report on funds by submitting quarterly Federal Cash Transaction Reports (PSC 272 A Report) directly to PMS. The PSC 272 A Report is an overview of the cash status of the account. It contains data provided by PMS to the recipient and the net disbursement amount as calculated by the recipient. The PSC 272 A Report is similar to a checking reconciliation. At the end of the grant performance period, the SF 425 Federal Financial Report MUST reconcile with the PSC 272 A Report and the amount drawn down. If these three numbers are not identical, the grant cannot be closed. Payment Management Services provides answers to Frequently Asked Questions concerning the Payment Management System (see Chapter 10 for *How to request funds through PMS SMARTLINK*)

References and Reminders

- Keep the CNCS State Office Program Officer apprised of any questions, concerns, issues, or developments related to the grant.
- Use these source documents to review specific requirements and procedures for financial reporting:
  - Notice of Grant Award (NGA) including Terms and Conditions, and any special conditions
  - RSVP Federal Regulations [45 CFR 2553.73]
  - Refer to FFR Instructions and Sample Form for help with the FFR.
- Funds returned to CNCS at the close out of the grant relationship with CNCS or for disallowance of grant costs are to be the forwarded to CNCS's collection officer in the FFMC***, but only as directed by the grant official.*** (See **Appendix 16**: *Guidance for Closing Out Your CNCS Grant)*
- Delays in submitting FFRs may cause advance or reimbursement requests to be delayed until the overdue FFR is received.

11.1.2 Progress Reports

1) Project Progress Report Annual and Semiannual

The *Progress Report Annual* and *Project Progress Semiannual* are used to ensure RSVP grantees address and fulfill legislated program purposes; meet agency program management and grant requirements; track and measure progress to benefit the local project and its contributions to volunteers and the community.

Projects report progress toward meeting the objectives of the project plan which consists of the series of work plans agreed upon in the awarded grant. In addition to project plan reports, narratives in the Progress Report Annual are used to report challenges encountered, partnerships developed, non-federal fund development, volunteer stories, and other accomplishments.

Progress reports are prepared and submitted in the CNCS electronic grants management system after the first six months and at the end of the budget year, unless noted otherwise on the NGA or in the Terms and Conditions for your grant. The due date is no later than 30 days after the end of the

reporting period. (See the Managing Senior Corps Grants for the *Progress Report Instruction* and **Appendix 17** for Progress Report Tips.)

2) Progress Report Supplement

The *Progress Report Supplement* (PRS) is the annual data collection conducted by CNCS to aggregate the latest numbers and accomplishments of Senior Corps grantees.

The sponsor completes the PRS in the CNCS electronic grants management system in the first quarter of the federal fiscal year (October – December). The report asks the project to provide a statistical profile of the RSVP volunteers serving during the 12 month reporting period, including volunteer demographics and project activities.

3) Note: Late submission of financial or progress reports may result in the CNCS placing a temporary hold on grant funds. A temporary hold is implemented if the report is not received by CNCS within 45 calendar days after the established due date. An established due date includes an extended due date, when applicable.

11.2 RECORDKEEPING

As required by 45 CFR 2553.25(g), the sponsor must develop record keeping and reporting systems in compliance with CNCS requirements that ensure quality of program and fiscal operations and facilitate timely and accurate submission of required reports. The sponsor's records also document compliance with regulatory programmatic and fiscal requirements and must be available to CNCS staff to review on compliance monitoring site visits or in case of audit.

Records may be kept in electronic or hard copy form.

11.2.1 Sponsor Records on Volunteer Stations

The project maintains a file on each volunteer station containing:

1. A current, signed Memorandum of Understanding. (See Chapter 6 for more information about the MOU)
2. Letters of Agreement, where there are in-home assignments through the volunteer station.
3. A listing by name of the RSVP volunteers placed at the volunteer station.

11.2.2 Sponsor Records on Individual RSVP Volunteers

The project should maintain records for each volunteer containing:

1. An enrollment form signed and dated by the volunteer, including name, address, telephone number and date of birth.
2. A signed Designation of Beneficiary (for insurance purposes).
3. The name of the volunteer station(s) where the RSVP volunteer is placed.
4. A copy of the written assignment description for each volunteer or a notation that the volunteer's assignment description is maintained at the volunteer station.

CNCS highly recommends that confidential volunteer records be kept in secured files to protect all personally identifiable information.

Personal information about volunteers contained on the enrollment form, such as home address, should be disclosed only with the expressed prior written permission of the volunteer.

Records may be subject to state law or local ordinance governing access to records.

11.2.3 Data Collection and Retention (including Financial Data)

1) Periodic Data Collection: Accuracy and timeliness of reports are facilitated by collecting and recording data needed on a regular basis using consistent procedures and tools.

2) Keep records of how data was collected: Data reported must be verifiable.

3) Retain Records: Data collected, including financial records, must be retained for at least three years from the date the grantee submits the final FFR for the project period or three years past the last audit, whichever is most recent.

4) Salary and Wage Documentation**:** Following is a summary of the requirements for documenting project staff time and attendance from the 2 CFR 200 Grants and Agreements.

    a. Reflect an after-the-fact distribution of the employee's actual work activity for each pay period.

    b. Account for the total activity of each employee paid from the grant.

    c. Be prepared at least monthly and must coincide with one or more pay periods.

    d. Be signed by the employee or supervisor having firsthand knowledge and certified by an authorized sponsor official.

5) National Service Criminal History Checks (NSCHC) for staff: The NSCHC is a screening procedure established by law to protect the beneficiaries of national service. For RSVP, the requirements apply to anyone receiving any part of their salary from the RSVP grant funds (federal or non-federal share).Sponsor are required to have documentation verifying that the required checks were made, the results were evaluated, and the sponsor NSCHC policy is on file and available for CNCS compliance monitoring and for other audit purposes. Confidential files should be secured to protect identity.Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. Please read the NSCHC webpage carefully to be sure your policies and your implementation procedures are in compliance with the requirement. (See Handbook Chapter 5 and the NSCHC Supplement to Chapter 5 for more information.)

6) In-Kind Contributions: Documentation for in-kind contributions must record donation and valuation of each item. The value of In-kind contributions should be entered into the general ledger and the Federal Financial Report submitted to CNCS.

    a. To be acceptable as non-federal share (match) all cash and/or in-kind donations must meet the Cost Principles requirement that the cost (donation) must be **allowable, reasonable, necessary, and allocable** for the performance of the grant award.

    b. To value an in-kind contribution, fair market value is the standard. Fair market value (FMV) is the price that property would sell for on the open market. It is the price that would be agreed on between a willing buyer and a willing seller, with neither being

required to act, and both having reasonable knowledge of the relevant facts. If a donor puts a restriction on the use of donated property, the recipient of the donation must honor that restriction. Finally, the in-kind voucher form signed by the donor should be reviewed to ensure the value is reasonable and comparable with other estimates or bases for value.

c. The in-kind voucher justifies the valuation of personal services, material equipment, building, and other non-cash donations. The voucher should include: the name and signature of the donor, the date, the location of the donation, a description of the item/service donated, and the estimated value of the donation. Grantees should acknowledge the contribution with a receipt that includes the name of donor, date and location of donation, a description of item/service, and the estimated value. A copy of the receipt should be kept in sponsor's files. For more information see: Sample In-Kind Contribution Form and Tutorial: Valuing, Documenting, and Recording In-Kind Match

7) Reimbursement Claims: Documentation for all Volunteer Expenses related to transportation, meals, and/or other costs claimed during the period of volunteer service must for compliance monitoring or audit purposes:

a. Contain the volunteer's name, number or other identifying information used by the project.

b. Specify the type of expense reimbursement such as mileage or meals.

c. Specify the amount to be reimbursed.

d. State the reason for reimbursement.

e. Include documentation of the expense required by the sponsor.

f. Specify the date the expense was incurred.

g. Provide a way for the volunteer to certify that the expense was incurred during service hours.

Reminder

Travel to and from home to the volunteer assignment, and meal times that are not part of the assignment description, are not to be included in hours of service.

8) Projects that use timesheets may incorporate volunteer expense claims on the timesheet form. Costs must be verified by signatures of the volunteer, the volunteer station supervisor, and designated RSVP staff. (See **Appendix 3** for a sample timesheet that incorporates hours of service, and mileage expenses.)

9) Using RSVP Volunteers for Data Collection/Record Keeping: RSVP volunteers can be assigned by project directors to various tasks that involve data collection and record keeping (For more information regarding RSVP sponsors as volunteer station see Chapter 6)

11.2.4 Counting and Reporting RSVP Volunteers, Performance Measures, and Other Metrics

RSVP projects are responsible for having a system that allows them to track all required data accurately and in sufficient detail to meet the requirements of the progress reports, including the Progress Report Supplement

1) Reporting requirements for the Progress Reports and the Progress Report Supplement are found in the NGA or the Terms and Conditions for your grant.
2) The reported number of volunteers serving and hours served should be approximately equal to or greater than the numbers projected in the budget. CNCS will monitor and verify numbers reported.
3) See "Criteria for an Effective RSVP Volunteer Service Tracking System" in the following box.

Criteria for an Effective RSVP Volunteer Service Tracking System

1. The system is documented in written sponsor policies as the standard used by the RSVP project and:
   (a) Defines and describes the system
   (b) Identifies tools to be used
   (c) Identifies allowable persons and authentication method such as hard copy signature or e-mail
   (d) Specified location of official records
   (e) Requires storage and retrieval of records – hard copy or electronically
2. The system's reporting tools, such as the following, are consistent with sponsor policy:
   (a) Hard copy time sheet
   (b) Hard copy group sign in sheet
   (c) E-mails relating to a volunteer's hours are sent by an appropriate, authorized person – e.g., the volunteer's supervisor or the volunteer.
   (d) Electronic group sign-in sheet
   (e) Telephone report by volunteer supervisor or volunteer with written confirmation consistent with the sponsor policy
   (f) Fax or Scan
   (g) Web-based system
3. The system provides assurances that the person reporting the hours is authorized to do so – such as the volunteer or the volunteer station supervisor.
4. If hours are submitted via e-mail by the RSVP volunteer or the volunteer station supervisor:
   (a) Sender uses an e-mail system that requires a recognizable sign-in name that is registered with the sponsor/project as the volunteer.
   (b) The e-mail is addressed to the person identified by the RSVP/sponsor policies as having the authority to accept and view e-mails reporting hours.
   (c) The system used by the e-mail recipient (i.e. RSVP Project Director) is capable of storing and retrieving the e-mails reporting RSVP volunteer hours.

11.3 PROJECT COMPLIANCE MONITORING SITE VISIT

CNCS State Offices are required to conduct a Compliance Monitoring visit to each project site at least once every six years. Monitoring planning assessments, operational issues, or training and technical assistance needs may warrant on-site compliance visits and/or training and technical assistance visits in the interim years. Site visits are conducted for the following purposes:

- Test compliance with Senior Corps legal, regulatory, and policy requirements
- Identify and minimize potential risks to the Corporation
- Identify specific technical assistance needs
- Document effective practices
- Recognize accomplishments
- Improve quality of programming
- Determine effectiveness of performance measurement
- Provide guidance
- Analyze recurring problems.

The CNCS State Office will send a letter prior to the site visit confirming the visit and provide a copy of the "***Senior Corps Guide for Quality Assurance and Compliance Monitoring Site Visits***" (also called simply the "***Compliance Monitoring Guide***") to the sponsor's Chief Executive Officer (CEO) or Executive Director (ED) and the project director. The CEO/ED and project director are encouraged to read this document in advance of the planned visit, as it provides details on the questions to be answered by the visit, the form in which information is reported and retained in the CNCS State Office's project files, and suggests the types of documentation the project should have readily at hand during the visit.

Following the visit, within 30 calendar days, the CNCS staff responsible for the compliance monitoring will send a follow-up letter to the ED/CEO of the sponsoring organization with a copy to the project director. The letter will include but is not limited to:

- Outcomes of the visit
- Areas of non-compliance or potential risk
- Corrective actions to be taken
- Effective practices found

Any fiscal findings or audit recommendations are provided to the grant official in the FFMC. A signed copy of the project Compliance Monitoring Guide is retained in the project file.

11.4 Effective Practices In Reports And Record Keeping

A. The project is familiar with the reports required to fulfill the grant terms and conditions, and regularly submits accurate reports by the required deadlines, including:

   1. Semi Annual and Annual Progress Report
   2. Progress Report Supplemental (Annually);
   3. Federal Financial Report (Every 6 months).

B. The project discusses reports and requirements with its CNCS program officer and grant official if any information requested is unclear.

C. The project designates accounting professionals within the sponsoring organization to take the lead in financial reporting.

D. The project develops an overall information collection and reporting system plan.

   1. The project uses the Project Work Plans and Performance Measures as blueprints to guide systems that will capture information and data for reporting.
   2. If possible, the project invests in a volunteer management software tool to streamline and automate its ongoing data collection and volunteer tracking. See **Appendix 19** for a list of software packages available and vendor contact information.

E. For performance measurement data collection and reporting, the project:

   1. Works in conjunction with the volunteer stations hosting the volunteers. The project coordinates with volunteer station supervisors to link into the station's data and reporting systems, rather than independently establishing its own unique systems. Volunteer stations exist to deliver specific services to the community and those served, and will likely have methods and resource persons available that can be utilized to track volunteer accomplishments without having to start from scratch.
   2. Ensures that the volunteer station supervisors and personnel who will assist with data and information collection understand the needs related to the Senior Corps volunteers if the project's request includes or anticipates new data elements or types of information.
   3. Incorporates data and information collection into the Memorandum of Understanding with the volunteer station.

F. The project directors are encouraged to communicate with other Senior Corps project directors to share ideas, receive recommendations, trade tips, and provide suggestions and support.

12 COMMUNITY PARTNERSHIPS AND COLLABORATION

12.1 COORDINATION WITH OTHER CNCS PROGRAMS AND COMMUNITY ORGANIZATIONS

Days of service and special initiatives are an integral part of the way that CNCS meets our mission. They allow us to showcase at a national and local level how our service supports specific issues. Each grantee can participate in these events in a variety of ways that range from hosting an event that aligns particularly well with the sponsoring organization's mission to collaborating with other CNCS streams of service to remain engaged and connected to our shared vision.

The sponsor is highly encouraged to coordinate activities with other CNCS programs, including AmeriCorps State and National, AmeriCorps NCCC, AmeriCorps VISTA, the Social Innovation Fund and the Volunteer Generation Fund. Moreover, the sponsor can coordinate activities with other project-related groups and individuals that have strategic objectives similar to those of CNCS, such as those representing state and local governments, State Service Commissions; industry, labor, and volunteer organizations; programs for children; programs for the aging; and health-care organizations. The goal of such coordination is to facilitate cooperation with existing or planned community services and to develop community support. These coordination activities are specifically encouraged around the following programmatic activities:

a) *National Days of Service*: Each year CNCS spearheads the effort to encourage Americans to volunteer in their communities during the Martin Luther King Jr. Day of Service and the September 11th National Day of Service and Remembrance. On these days of service, CNCS provides tools and resources for organizations and individuals to become engaged in service activities. Joining together with regional or local national service programs increases the visibility of the service projects, and reduces duplication of administrative efforts to coordinate events.

b) *Special Initiatives*: CNCS supports a variety of special initiatives such as Mayor, County, and Tribal Recognition Day for National Service and National Mentoring Month. These events and priorities, like National Days of Service, are best implemented in your community in partnership with other national service projects serving in your region.

c) Coordinated Recruitment: In some communities national service programs are looking to recruit distinctly separate candidates in the same communities. Coordinating around recruitment efforts and encouraging referrals when a candidate is not a good fit for your program but maybe a good fit for another program strengthens the national service network and helps everyone meet their recruitment goals.

Sponsors should use sound planning and preparation to generate local support. Development of cost sharing support can be facilitated by integrating the project into the community. Suggested steps toward achieving coordination are:

a) Prepare a brief summary of the project, its plans and accomplishments, its value to the community, and a statement of the types and amounts of support it needs.

b) Conduct a thoughtful assessment of the stakeholders of your program. Stakeholders include all organizations, businesses, and municipalities, which are benefiting from the impact of your program. Stakeholders could also include any organizations that are working toward the same goals in your service area.

    1. Schedule meetings with stakeholders and individuals or groups who can contribute to the project or who can influence others to contribute.

    2. Follow up the meeting with each person or group contacted with a thank you, additional information, or an opportunity to continue to work together.

    3. Strengthen the above activities by involving selected members of the RSVP advisory council.

    4. Collaborate with other Senior Corps projects to generate statewide, citywide, countywide, and multi-county support.

12.2 PUBLIC AWARENESS

1) A strong community relations program ensures public awareness of start-up activities and continuing project development.

2) The project sponsor should keep social service agencies; city, county, and state elected officials; governmental department heads; community organizations, including those serving senior citizens; and the media updated about the project's development, services, growth, and accomplishments.

3) Public awareness can be advanced through public speaking appearances by staff and advisory council members before service clubs, fraternal organizations, religious groups, and meetings with local, county, and state governmental units. Public relations materials about CNCS's programs and media kit materials are available at the CNCS website.

4) Active support of the RSVP advisory council enhances community interest in project activities. Some RSVP advisory councils have formed community relations or publicity and marketing committees which assist the project in building awareness, coordinating with other community groups, and speaking about RSVP volunteers before organizations in which they are active.

5) RSVP is included in the CNCS national advertising program. Through CNCS's Office of External Affairs, continuing efforts are made to place program information and human interest stories in national and local publications.

6) Public awareness of the nationwide program and of the local project should be promoted regularly through local media, a project website and social media accounts. Systematic contacts with newspapers, radio, and TV should be established and maintained. Announcements of local news value should be prepared and forwarded to the media. (See

Chapter 1, *Office of External Affairs,* for more information and tools.)Some examples of newsworthy announcements are:

a) The establishment of a new volunteer station at a site that is of significant importance or well recognized in the community.

b) The appointment of new members to the RSVP advisory council or the establishment of a special committee of the advisory council that addresses issues that are significant to your community.

c) Statements made by elected officials, and other governmental and civic leaders in support of the project.

d) Achievement of a measurable impact on a critical community need.

e) Any special RSVP project event, such as key community service projects and the presentation of awards to the volunteers or to the project staff for significant achievements.

f) Engagement of the community and the volunteers around the National Days of Service or other CNCS Special Initiatives.

7) Engaging in social media is a vital part of a modern public engagement plan. With the popularity of social media many community members are learning about the news in their community through social media platforms. For many projects, social media engagement is the driving vehicle for recruitment, recognition and communicating the impact of their program.

8) Particularly in smaller communities, the news media are usually interested in providing time or space for interviews with RSVP volunteers or project staff. They are especially receptive to human interest stories.

12.3 Effective Practices in Community Relations

I. Effective Practices for Increasing the Visibility of Service to the Community by Older Volunteers

The project:

A. Develops, implements, and periodically updates a plan to promote ongoing community awareness of and support for the project.

B. Makes presentations about the project to community organizations and interested parties;

C. Has a media awareness campaign to promote community awareness and support;

D. Has a presence on social media platforms;

E. Develops active roles for all stakeholders, including sponsor staff, project director, sponsor Board, volunteers, RSVP advisory council , and volunteer station staff, in promoting the project in the community;

F. Can demonstrate that the community recognizes the project's contributions to meeting community needs by acknowledging the project or individual volunteers;

G. Broadly disseminates information on project accomplishment and impact to the community, volunteer stations, volunteers, funding supporters, other community agencies, the general public, the Senior Corps, and other key stakeholders so that:

H. The community perceives the project as a leader in effectively meeting critical community needs; and

I. The community perceives RSVP volunteers as active seniors who meet critical community needs.

II. Effective Practices for Coordinating RSVP Services

The project and volunteer stations:

A. Collaborate with other CNCS funded national service programs, including AmeriCorps VISTA, AmeriCorps State and National, AmeriCorps NCCC, the Social Innovation Fund, the Volunteer Generation Fund, and other Senior Corps programs, to meet critical community needs;

B. Participate in the National Days of Service and CNCS Special Initiatives in partnership with other national service projects in their service area; and

C. Build broad-based relationships in the community, including the business sector, to gain their support for older volunteers.

13 RSVP HANDBOOK CROSS REFERENCE INDEX

URL Links and Appendices Documents by Chapter

This index lists the links and appendices documents that are included in the RSVP Handbook for easy reference. The chart lists the chapter, the name of the link, the complete URL that you can click or cut-and-paste into your browser, and the number and title of the appendix document.

Links to RSVP Program Regulations: All of the Handbook chapters have links to the Electronic Code of Federal Regulations. The regulations governing RSVP are in Chapter XXV, Part 2553, of the Code of Federal Regulations which is typically cited as "45 CFR 2553." Use the reference numbers in the link to find the specific regulation you need. (For example: 45 CFR 2553.22 refers to the *Responsibilities of RSVP Sponsor*.)

URL for 45 CFR 2553:

http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=45:4.1.9.11.35&idno=45

Chapter 1	
AmeriCorps NCCC webpage	http://www.nationalservice.gov/programs/americorps/americorps-nccc
AmeriCorps Programs webpage	http://www.nationalservice.gov/programs/americorps
AmeriCorps State & National webpage	http://www.nationalservice.gov/programs/americorps/americorps-state-and-national
AmeriCorps VISTA webpage	http://www.nationalservice.gov/programs/americorps/americorps-vista
CNCS Electronic Grants System	http://www.nationalservice.gov/build-your-capacity/grants/egrants
CNCS Logo webpage	http://www.nationalservice.gov/newsroom/outreach-resources/logos
CNCS National Performance Measures	http://www.nationalservice.gov/resources/performance-measurement
CNCS Strategic Plan	http://www.nationalservice.gov/about/strategic-plan
Edward M. Kennedy Serve America Act	http://www.nationalservice.gov/sites/default/files/documents/1990_serviceact_as%20amended%20through%20pl%20111-13.pdf
eGrants Helpdesk/ National Service Hotline	http://www.nationalservice.gov/build-your-capacity/grants/egrants
Evaluation Resources	http://www.nationalservice.gov/resources/evaluation
Evidence Exchange	http://www.nationalservice.gov/impact-our-nation/evidence-exchange
Faith-Based and Neighborhood Partnerships	http://www.nationalservice.gov/special-initiatives/communities/faith-based-and-other-community-initiatives-and-neighborhood
Financial Management	http://www.nationalservice.gov/resources/financial-management

Resources	
Foster Grandparent Program webpage	http://www.nationalservice.gov/programs/senior-corps/foster-grandparents
Funding Opportunities Webpage	http://www.nationalservice.gov/build-your-capacity/grants/funding-opportunities
Marketing and Media	http://www.nationalservice.gov/resources/marketing-and-media
Media materials	http://www.nationalservice.gov/newsroom/outreach
National and Community Service Act of 1990	http://www.nationalservice.gov/sites/default/files/documents/1990_serviceact_as%20amended%20through%20pl%20111-13.pdf
National & Community Service Trust Act of 1993	http://www.nationalservice.gov/sites/default/files/documents/cncs_statute_1993.pdf
National Service Criminal History Checks	http://www.nationalservice.gov/resources/criminal-history-check
National Service in Your State	http://www.nationalservice.gov/impact-our-nation/state-profiles
National Service Timeline	http://www.nationalservice.gov/about/who-we-are/our-history/national-service-timeline
National Service website	www.nationalservice.gov
Ordering CNCS Publications	https://pubs.nationalservice.gov/
Outreach Resources	http://www.nationalservice.gov/newsroom/outreach
Senior Corps Branding Guidelines	http://www.nationalservice.gov/sites/default/files/page/Senior_Corps_Branding_Guidelines.pdf
RSVP Program Regulations	http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=45:4.1.9.11.35&idno=45
RSVP webpage	http://www.nationalservice.gov/programs/senior-corps/rsvp
Senior Companion Program webpage	http://www.nationalservice.gov/programs/senior-corps/senior-companions
Senior Corps Programs	http://www.nationalservice.gov/programs/senior-corps
Senior Corps Resources landing page	http://www.nationalservice.gov/resources/senior-corps
Social Innovation Fund	http://www.nationalservice.gov/programs/social-innovation-fund
Special Initiatives including: ML King Day of Service, SC Week, and more.	http://www.nationalservice.gov/special-initiatives
Terms and Conditions	http://www.nationalservice.gov/resources/terms-and-conditions-cncs-grants
The Knowledge Network	http://www.nationalservice.gov/resources
The Knowledge Network Online Courses	http://www.nationalservice.gov/resources/online-courses
Uniform Guidance	http://www.nationalservice.gov/resources/uniform-guidance
Veterans and Military Families	http://www.nationalservice.gov/resources/veterans-and-military-families
Volunteering and Civic Life in America report	http://www.nationalservice.gov/impact-our-nation/research-and-reports/volunteering-in-america
U.S. Government Manual	http://www.usgovernmentmanual.gov/?AspxAutoDetectCookieSupport=1
Chapter 2	

Funding Opportunities	http://www.nationalservice.gov/build-your-capacity/grants/funding-opportunities
Grants.gov	http://www.grants.gov/
Guidance on Prohibition of Fee-for-Service Activities.	http://www.nationalservice.gov/documents/senior-corps/2016/guidance-prohibition-fee-service-activities
National Service	http://www.nationalservice.gov/
Non Displacement of Employed Workers 45 CFR 1216.1.1 – 1216.1.4	http://www.ecfr.gov/cgi-bin/text-idx?SID=c2e77c380debb82b4915f2177fe25633&mc=true&node=pt45.4.1216&rgn=div5
Terms and Conditions	http://www.nationalservice.gov/resources/terms-and-conditions-cncs-grants
Appendix 12	Assurances
Appendix 13	Certifications
Appendix 11	*Fund Raising - Frequently Asked Questions*
Appendix 15	*Primer on Civil Rights Compliance*
Chapter 3	
CNCS Knowledge Network	http://www.nationalservice.gov/resources/performance-measurement/senior-corps
CNCS's national performance measures	http://www.nationalservice.gov/resources/performance-measurement
Evidence Exchange	http://www.nationalservice.gov/impact-our-nation/evidence-exchange
Managing Senior Corps Grants: NOF0, Application, and Application App B	http://www.nationalservice.gov/programs/senior-corps/managing-senior-corps-grants
Chapter 4	
Building an Effective Advisory Council	http://educationnorthwest.org/sites/default/files/factsheet21.pdf
Roles and Responsibilities of Advisory Councils	http://www.nationalservice.gov/resources/senior-corps/understanding-roles-and-responsibilities-advisory-councils
Chapter 5- Need to add CHC final version links	
National Criminal Checks Resources	http://www.nationalservice.gov/resources/criminal-history-check
Senior Community Service Employment Program	https://doleta.gov/Seniors/html_docs/PYdirectory.cfm
Chapter 6	
Guidance on Prohibition of Fee-for-Service Activities	http://www.nationalservice.gov/documents/senior-corps/2016/guidance-prohibition-fee-service-activities
Managing Senior Corps Grants webpage for Station Roster	http://www.nationalservice.gov/programs/senior-corps/managing-senior-corps-grants

Instructions	
Non Displacement of Employed Workers 45 CFR 1216.1.1 – 1216.1.4	http://www.ecfr.gov/cgi-bin/text-idx?SID=c2e77c380debb82b4915f2177fe25633&mc=true&node=pt45.4.1216&rgn=div5
Appendix 5	Letters of Agreement for In-Home Assignments
Appendix 1	Memorandum of Understanding
Chapter 7	
The Knowledge Network	http://www.nationalservice.gov/resources/senior-corps
Appendix 4	RSVP Sample Volunteer Assignment Description
Appendix 5	Letters of Agreement for In-Home Assignments
Chapter 8	
All for Good	http://www.allforgood.org/
National Criminal Checks Resources	http://www.nationalservice.gov/resources/criminal-history-check
National Sex Offender Public Website	www.nsopw.gov
Staff Screening Tool Kit	www.nationalservice.gov/screeningtoolkit
Appendix 2	Sample Volunteer Enrollment Form
Appendix 7	Sample Volunteer Information Update Form
Chapter 9	
Senior Corps Insurance Requirements	http://www.nationalservice.gov/documents/senior-corps/2015/senior-corps-insurance-requirements
Appendix 14	Guidance for Recognition Costs
Appendix 3	Sample RSVP Timesheet and Mileage Request
Chapter 10	
Chapter 10 References to 2 CFR:	Link to the 2 CFR which is also called the Uniform Guidance. http://www.ecfr.gov/cgi-bin/text-idx?SID=b9a3c6bc45dc33da0b90c5da0844bfeb&mc=true&node=pt2.1.200
2 CFR Subtitle A Chapter II 200.300 to 200.345	
2 CFR Subtitle A Chapter II 200.500 – 200.520	
2 CFR Subtitle A Chapter II 200.400 to 200.475	
2 CFR § 200.430 Compensation – personal services	
2 CFR Chapter II Subpart D Section 200.306 Cost Sharing or Matching	
2 CFR Chapter II, Subpart D, Section200.305	
OMB Post Federal Award Requirements	

OMB Guidance for Grants and Agreements	
OMB Cost Principles	
OMB Budget Guidance Audit Requirements	
States and Local Government and Indian Tribe Indirect Cost Proposals	
Audits	http://content.govdelivery.com/accounts/USCNCS/bulletins/1373ea5
Cost Principles	http://www.nationalservice.gov/resources/uniform-guidance
Federal Audit Clearinghouse	https://harvester.census.gov/facweb/
Indirect Costs: Rate Agreements and Cost Allocation Principles	http://www.nationalservice.gov/resources/financial-management/indirect-costs-rate-agreements-and-cost-allocation-principles
Key Concepts of Financial Management	http://www.nationalservice.gov/resources/financial-management/key-concepts-financial-and-grants-management
PMS-Help and training for grantees using the Payment Management System	www.dpm.psc.gov/grant_recipient/shortcuts/shortcuts.aspx?explorer.event=true
PMS login - SMARTLINK	https://www.dpm.psc.gov/access_pms/system_status.aspx
PMS- PSC 272 Report Instructions	www.dpm.psc.gov/grant_recipient/psc_272_reports/272_general.aspx?
RSVP Grant Application (Managing Senior Corps Grants webpage)	http://www.nationalservice.gov/programs/senior-corps/managing-senior-corps-grants
Single Audit Act Amendments of 1996	http://www.grants.gov/web/grants/learn-grants/grant-policies/single-audit-act-amendments-1996.html
Terms and Conditions	http://www.nationalservice.gov/resources/terms-and-conditions-cncs-grants
Uniform Administrative Requirements (Uniform Guidance)	http://www.nationalservice.gov/resources/uniform-guidance
Chapter 11	
FFR Instructions and Sample Form	http://www.nationalservice.gov/resources/financial-management/federal-financial-report-ffr
Managing Senior Corps Grants webpage - Progress Report Instructions	http://www.nationalservice.gov/programs/senior-corps/managing-senior-corps-grants
National Service Criminal History Check	http://www.nationalservice.gov/resources/criminal-history-check
National Sex Offender Public Website (NSOPW)	www.nsopw.gov
PMS -Payment Management System	https://www.dpm.psc.gov/access_pms/system_status.aspx
PMS - Frequently Asked Questions	https://dpm-portal.psc.gov/Welcome.aspx?pt=DPM

Sample In-Kind Contribution Form	http://www.nationalservice.gov/resources/financial-management/match-documenting-cash-and-kind
Terms and Conditions	http://www.nationalservice.gov/resources/terms-and-conditions-cncs-grants
Tutorial: Valuing, Documenting, and Recording In-Kind Match	http://www.nationalservice.gov/sites/default/files/olc/moodle/fm_key_concepts_of_cash_and_in_kind_match/view5f46.html?id=3213&chapterid=2270
Appendix 3	Sample RSVP Timesheet with Mileage Request
Appendix 16	Guidance for Closing-Out Your CNCS Grant
Appendix 19	Volunteer Tracking Software Distributors
Chapter 12	
National Days of Service and Special Initiatives:	http://www.nationalservice.gov/special-initiatives/days-service
Media kit materials	http://www.nationalservice.gov/newsroom/outreach.
Public relations materials	http://www.nationalservice.gov/resources/senior-corps/resources-senior-corps-programs.

14 NSCHC SUPPLEMENT

The Code of Federal Regulations 45 CFR 2540.200–207 that outlines the NSCHC requirements is the standard by which compliance is determined. This supplement is provided as a summary to highlight of key elements of the NSCHC requirements that apply to RSVP.

Refer to the NSCHC webpage for the most up to date NSCHC information and resources.

NSCHC Overview:

Under the National and Community Service Act of 1990, as amended by the Serve America Act, all CNCS grantees must conduct NSCHCs on **grant-funded staff** and national service participants that receive a salary, national service education award, living allowance, or stipend under CNCS grants. Individuals in these positions must undergo the process in a timely manner, or the noncompliant grantee may be subject to cost disallowance. Certain parts of the process need to occur prior to charging any staff time to a CNCS grant. Therefore, it is critical to comply with the NSCHC requirements **on time, every time**.

The Code of Federal Regulations outlines the National Service Criminal History Check rules and regulations in full at 45 CFR 2540.200–207. Additional information on NSCHC, including an eCourse, an FAQ document, and links to technical assistance resources can be found on the NSCHC webpage.

These requirements are statutory minimums, and individual grantees can, and often should, supplement these with additional safeguards for vulnerable populations, such as additional screening mechanisms, additional eligibility criteria, a code of conduct, training for staff and volunteers, and a clear system for reporting and handling reports of any harm or potential harm to vulnerable populations resulting from their program. Contact your CNCS State Office for more resources on ways to protect your program's vulnerable beneficiaries.

Covered Positions:

Any individual that receives a salary, stipend, living allowance or education award from a CNCS-funded grant, including individuals whose positions are funded by the federal share, match, or a combination of the two, are covered. In RSVP, any staff who appear in the personnel section of a grant, including both the federal share and match, are covered. **RSVP**

grantees are not required to conduct the NSCHC on their volunteers. They may choose to do so at their own discretion to provide a higher level of safety to program beneficiaries. Individuals that receive salaries reflected only in the Excess column are also not covered, though organizations may choose to conduct the NSCHC process on these individuals as well for administrative simplicity and additional safety.

Ineligibility for Employment or Service

There are four categories under which a program must always deny an individual work or service in a covered position:

1. Anyone listed, or required to be listed, on a sex offender registry
2. Anyone convicted of murder as defined and described in 18 U.S.C. § 1111
3. Anyone who refuses to undergo the NSCHC process
4. Anyone who makes a false statement in connection with a program's inquiry concerning the NSCHC process. A false statement in this context has a specific legal definition, and does not include the unintentional omission of minor offenses unrelated to murder or sex offenses. See CNCS's Guidance on False Statements for more information.

Required Checks

All individuals who begin work or service in a covered position after April 21, 2011, must undergo:

1) A nationwide name-based search of the National Sex Offender Public Website (NSOPW) and

2) EITHER:

   a. A name- or fingerprint-based search of the statewide criminal history repository in the person's state of residence and in the state where the person will serve or work OR

   b. A fingerprint-based FBI criminal history check.

Furthermore, individuals with recurring access to vulnerable populations that begin work or service in a covered position after April 21, 2011, must undergo:

1) 1) A nationwide name-based search of the National Sex Offender Public Website (NSOPW) and

2) BOTH

- A name- or fingerprint-based search of the statewide criminal history repository in the person's state of residence and in the state where the person will serve or work AND
- A fingerprint-based FBI criminal history check.

Thus, individuals without recurring access will require at least two forms of checks (the NSOPW and either state checks OR FBI checks) and those with recurring access will require all three. **Recurring access** is the ability on more than one occasion to approach, observe or communicate with an individual through physical proximity or other means, including but not limited to electronic or telephonic communication. Note the following three points:

- It does not necessarily mean access has to be *frequent,* only that an individual has the ability to access vulnerable populations on more than one occasion.
- It does not have to be physical. Remote or telephonic access can create recurring access.
- It applies to a person providing services to vulnerable populations, not providing services *with* vulnerable populations. RSVP staff whose only contact with the elderly is via their volunteers would not have recurring access according to this definition.

Vulnerable populations for the purposes of the NSCHC requirements are:

- children age 17 or younger
- persons age 60 and older
- individuals with disabilities

For more information on the regulations prior to April 21, 2011, visit the NSCHC Knowledge Network for the Effective Dates Flowchart.

Timing of Checks

- The **nationwide NSOPW check** must be conducted and the results reviewed BEFORE an individual in a covered position begins work or starts service.
- The state or FBI criminal history checks must be **INITIATED** ON THE DAY OF or BEFORE an individual in a covered positions begins work or service. **Initiation** in this context is one step more than getting permission to conduct a check. This could include fingerprinting, mailing requests to obtain checks to the state repository, paying for checks, having forms for checks filled out by candidates, etc. As a grantee, you must choose a specific process that you will consider to be "initiation," document that in your

policies and procedures, apply it consistently and ensure that it happens no later than the first day of work or service for all individuals in covered positions.

- It is permitted to allow an individual in a covered position to begin work or start service pending the receipt of results from State checks or FBI criminal history checks as long as the individual is not permitted access to vulnerable populations without being in the physical presence of an appropriate individual. This process is called accompaniment, and is explained more below.

Accompaniment:

Accompaniment allows individuals to begin work or service while portions of the NSCHC process are pending. It refers to when an individual in a covered position is in the physical presence of another individual that has been cleared to access vulnerable populations. Accompaniment:

- Is required whenever an individual in a covered position has access to vulnerable populations while both their state and FBI checks are pending.
- Can be provided by someone in a covered position who has been cleared through CNCS' required CHC process. It can also be provided by an employee or representative of a placement site that has been cleared to work with vulnerable groups according to *that site's* rules, such as a teacher at a school or a social worker at a community center.
- Must be documented by recording the dates and times that accompaniment was provided and the name of the person who provided the accompaniment. You must also be able to document why the person providing accompaniment was qualified to do so.
- Can cease once a grantee clears an individual via either:
    - State checks (including the individual's state of residence check and state of service check, if applicable) OR
    - An FBI check

In other words, an individual does not need all checks to clear before he or she can begin working or serving without accompaniment.

Required Training

All grantees must have at least one individual receive training in the NSCHC requirements annually. The required training is available on the NSCHC Knowledge Network. Though only one individual per grant is required to take this training, CNCS recommends ensuring at least two individuals receive training in every grantee to mitigate the risk of noncompliance in the event of unsuspected absences or staff turnover.

Successful completion of the eCourse will create a dated certificate with an expiration date one year following the date of completion. Grantees must maintain this certificate as a grant record and store it with their other NSCHC documentation. After an appropriate individual within an organization has taken the course initially, that organization must ensure that it maintains one individual on staff with a current certification from the eCourse to remain in compliance. For example, if an individual in an organization first completes the eCourse on June 1, 2016, either that individual or another appropriate individual within the organization must complete the eCourse again before June 1, 2017.

Policies and Procedures

Prior to conducting National Service Criminal History Checks, the sponsor organization must establish policies and procedures. **Grantees should have written policies on their disqualification criteria and be consistent in how those criteria are applied.** Barriers to participation in national service programs for those formerly incarcerated people who are not statutorily ineligible to serve should be minimized as much as possible without putting program beneficiaries at genuine risk.

The policies and procedures should also include and address the following:

1) Process that you will consider to be "initiation" and ensure that it happens no later than the first day of work or service for all individuals in covered positions.
2) Process to verify the individual's identity by examining the individual's government-issued photo identification card, such as a driver's license; and how it will be documented in writing. Process to determine and document if the individual will have recurring access to vulnerable populations;
3) Process to obtain prior, written authorization from the individual**,** for the State registry check(s), for the FBI criminal history check, and for the appropriate sharing of the results of the checks within the program. *Prior written authorization from the individual is not required to conduct the nationwide NSOPW check*;
4) Process to document the individual's understanding that selection into the program is contingent upon the organization's review of the individual's National Service Criminal History Check component results;
5) Disqualification criteria and assurance that the criteria is applied to all individuals consistently;

6) Ensure that screening practices comply with federal civil rights laws, including Titles VI and VII of the Civil Rights Act of 1964 (and the Corporation's implementing regulations under Title VI);

7) Process to provide a reasonable opportunity for the individual to review and challenge the factual accuracy of a result before action is taken to exclude the individual from the position;

8) Process to provide safeguards to ensure the confidentiality of any information relating to the criminal history check, consistent with authorization provided by the applicant;

9) Process to document accompaniment until State Checks (including both State of Service and State of Residence) or FBI check is received. Ensure that an individual, for whom the results of a required state or FBI criminal history registry check are pending, is not permitted to have access to children age 17 years or younger, to individuals age 60 years or older, or to individuals with disabilities without being in the physical presence of one of the following individuals:

   - Your authorized representative who has previously been cleared for such access;
   - A family member or legal guardian of the vulnerable individual; or
   - An individual authorized, because of his or her profession, to have recurring access to the vulnerable individual, such as an education or medical professional.

9) Assurance that an individual will not be charged for the cost of any component of a National Service Criminal History Check unless specifically approved by the Corporation to do so.

In order to ensure that the National Service Criminal History Checks are conducted properly, it is strongly encouraged to include the following in your Policies and Procedures:

1) Process for about additional safeguard policies, such as periodic mini-audits or having two individuals review each file.

2) The annual training requirements required by CNCS as well as the grantee training requirements for staff.

Alternative Search Procedures

If a grantee wishes to vary from any of the specific NSCHC requirements, it must submit a request for approval of its proposed alternative to CNCS in advance of varying from these procedures. Programs can apply to CNCS for Alternative Search Procedures under the following circumstances:

- **Substantially Equivalent**: A grantee proposes alternative criminal history check procedures that are substantially equivalent to or better than the standard NSCHC requirements.
- **State Law Prohibition**: The grantee is prohibited by start law from complying with all of the standard NSCHC requirements.

The process for requesting an Alternative Search Procedure can be found here.

Vendor Compliance

If you are using a company to help with any part of the criminal history checks, you need to verify and retain documentation of all of the following:

If the company runs a search of the **NSOPW**:

- Does the company access www.NSOPW.gov (not another site/source) and conduct a nationwide search?
- Does the company report whether any registries were down when it conducted its search?
- Does the company have a process to get results from registries that are temporarily down?
- Does the company compare a government-issued ID photo of the individual with the photos generated by the search?
- Does the company review and clear results?
- Will the company provide the actual results? (If the vendor provides a clearance letter, see CNCS' Current Blanket ASPs on the Knowledge Network.)

If the company runs a search of **state criminal history repositories**:

- Does the company use the official criminal history repository in every state? See CNCS' list of state repositories and alternatives for the required sources.
- Is the company's ability to report convictions restricted or time-limited? (For example, if a company can only report results from the last seven years, as is the case in some states then that would not be compliant.
- Will the company provide the actual results? If the company provides a clearance letter, see CNCS' Current Blanket ASPs on the Knowledge Network for requirements.

If the company runs a **fingerprint-based FBI check**:

- Does the company submit fingerprints through the state repository?

- Will the company provide the actual results? If the vendor provides a clearance letter, see CNCS' Current Blanket ASPs on the Knowledge Network for requirements.

For **all** components:

- Does the company maintain records for as long as required under the grant

See Vendor Guidance on the Knowledge Network for more information.

Enforcement

Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. More information on cost disallowance can be found in the Interim Disallowance Guide for Staff and Grantees. Grantees that self-report non-compliance to a monitoring official prior to any written notice of future oversight or monitoring activity (such as IPERA sampling, IG audit or investigation, site visit, desk review, etc.) may receive a reduction in their cost disallowance. As a result, it is in an organization's interest to develop a system for monitoring its own compliance.

Additional NSCHC Resources

- Link to CNCS Knowledge Network/Criminal History Checks
- Video Training
- NSCHC eCourse
- FAQs
- CFR 45 Part 2540
- Effective Dates Outline
- Effective Dates Flowchart
- NSCHC Documentation Checklist
- NSCHC Interim Disallowance Guide August 2015, Training Materials and Job Aids
- Requirements and Definition of Terms

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Appendix 1: SAMPLE FORM

Projects are encouraged to customize as appropriate.

Memorandum of Understanding
ABC County RSVP

This Memorandum of Understanding (this "**MOU**") contains basic provisions, which will guide the working relationship between both parties. It is entered into by and between **ABC County RSVP**, sponsored by **ABC SPONSOR AGENCY** and the following agency and/or entity (the "**Station**"):

Station Name:_____ **EIN:** _____

Station Site Address:_____**City:**_____**State:**_____**Zip:** _____

(Station Mailing Address):_____**City:**_____**State:**_____**Zip:** _____

The *ABC County* and the *Station* may be referred to herein as the "**Parties**."

This MOU is effective on the day it is signed: From_____through_____. This MOU may be amended in writing at any time with the concurrence of both parties and must be renegotiated at least every three (3) years.

Basic Provisions

The ABC County's Responsibilities

1. Recruit, enroll, and interview RSVP volunteers.
2. Refer RSVP volunteers to the Station
3. Review acceptability of volunteer assignments.
4. Instruct RSVP volunteers in proper use of volunteer timesheets, reimbursement guidance, and the RSVP procedures.
5. Provide the RSVP orientation to the Station staff prior to placement of volunteers and at other times as needed.
6. Initiate publicity regarding RSVP.
7. Furnish accident, personal liability, and excess automobile insurance coverage for enrolled volunteers required by the RSVP policies. The insurance provided by the sponsor is secondary coverage and is not primary insurance.
8. Periodically monitor volunteer activities at the Station to assess and/or discuss needs of volunteers and the Station.
9. Staff an Advisory Council to RSVP. Along with the advisory council, arrange for appeals procedure to address problems arising between the volunteer, the Station and/or RSVP.
10. Arrange for appropriate RSVP recognition.
11. Coordinate with other volunteer and aging programs in the area to foster effective communication and avoid duplication.
12. Reimburse RSVP volunteers for transportation costs between their home and volunteer station in accordance with RSVP policies and availability of funds (if applicable).
13. Arrange with the Station for meals and/or snacks, whenever possible, for volunteers on assignment.
14. Provide photo identification for volunteers if not provided by the station.

The Station's Responsibilities

1. Interview and make final decisions on assignments of RSVP volunteers.
2. Perform, if required for a particular assignment, background or other screenings.
3. Implement orientation, in-service instruction, and/or special training of volunteers.
4. Furnish volunteers with materials required for assignment. These materials may include station uniform and photo I.D.
5. Provide supervision of volunteers on assignments. (Supervisor name and contact information on next page.)

6. Provide volunteer assignment descriptions for each volunteer opportunity at the Station.
7. Provide for adequate safety of volunteers and submit an annual assurance upon request to ABC County RSVP.
8. Investigate and report any accidents and injuries involving RSVP volunteers immediately to ABC County. All reports shall be submitted in writing.
9. Specify, either by written information or verbally, that RSVP volunteers are participants in the Station's programming in publicity featuring such volunteers. Display an RSVP placard where it may be viewed by the public.
10. **Reports:** The Station Representative shall:

- Timesheets**:** Report volunteer hours on a monthly basis on or before 10th of the following month (Insurance coverage is only effective with verified records of hours served.)
- Progress Reports: Stations are requested to complete a short bi-annual survey provided by RSVP documenting the impacts of services provided by volunteers.
- In-Kind Documentation: Provide documentation of in-kind contribution(s) (meals, uniforms, mileage reimbursement, training expenses) and verification to help RSVP meet its local match of 30%.

Other Provisions

1. **Separation from Volunteer Service**: The Station may request the removal of an RSVP volunteer at any time. An RSVP volunteer may withdraw from service at the Station or from the RSVP at any time. The RSVP staff, the Station staff, and volunteers are encouraged to communicate to resolve concerns or conflicts, or take remedial action, including, but not limited to, placement with another station.
2. **Letters of Agreement:** When in-home assignments of volunteers are made, a letter of agreement will be signed by the parties involved. The document will authorize volunteer service in the home and identify specific volunteer activities, periods, and conditions of service. A blank copy of the letter of agreement shall be accessible at the RSVP Office.
3. **Religious/Political Activities**: The Station will not request or assign RSVP volunteers to conduct or engage in religious, sectarian, or political activities.
4. **Displacement of Employees:** The Station will not assign RSVP volunteers to any assignment which would displace employed workers or impair existing contracts for services.
5. **Compensation:** Neither the station nor RSVP will request or receive compensation from the beneficiaries of RSVP volunteers. RSVP volunteers will not receive a fee for service from beneficiaries.
6. **Accessibility and Reasonable Accommodation**: The Station will maintain the programs and activities to which RSVP volunteers are assigned accessible to persons with disabilities (including mobility, hearing, vision, mental, and cognitive impairments or addictions and diseases) and/or limited English language proficiency and provide reasonable accommodation to allow persons with disabilities to participate in programs and activities.
7. **Prohibition of Discrimination:** The Station will not discriminate against RSVP volunteers or in the operation of RSVP on the basis of race; color; national origin, including limited English proficiency; sex; sexual orientation; age; political affiliation; religion; or on the basis of disability, if the volunteer is a qualified individual with a disability.
8. **Termination of MOU**: This MOU may be terminated at any time by either party by sending written notice of termination of the MOU to the other party. This MOU shall be reviewed at least every three (3) years by the Parties.
9. **Signatures**. By signing this MOU, the Station, through its authorized representative, self-certifies that it meets the requirements necessary to become a RSVP Station.

10. **If meals are provided by the Station to RSVP volunteers, please complete this portion:**

( ) Contributed meals are **FEDERALLY FUNDED** under:

_____Title III of the Older Americans Act _____Other (federal) funding source

( ) Contributed meals are **not provided by FEDERAL FUNDS**.

Meals will be provided to RSVP volunteers at a free or reduced price of $_____when_____hours of service have been or will be volunteered during that day. The value of the meal provided is $_____each. (RSVP will utilize this information to meet its local in-kind match.)

For All Stations

Volunteer Supervisor [Station Staff]

Name:	**Title:**
Phone:	**Email:**

Volunteer Station Primary Type: To qualify as a RSVP Station, an agency/office/department must self-certify that it is one of the following:

☐Public Non-Profit ☐Private Non-Profit ☐Proprietary Health Care Agency ☐Governmental Agency

Authorized Signatures

_____

Authorized Station Representative **Date**

_____

RSVP Project Director [or other sponsor designated representative] **Date**

PLEASE RETURN THIS COMPLETED FORM TO: ABC RSVP, PO Box 123, Our Town, XX 81234

Please include a volunteer assignment description for each volunteer opportunity at the Station. Thank you!

Appendix 2 This is a sample form. Projects are encouraged to customize as appropriate. All project forms should comply with Senior Corps requirements as well as grantee policies.

FOR OFFICE USE ONLY!

Station(s) _____

Assignment(s) _____

Date Assigned:_____/____/____

Computer Entry:____/___/____

By:_____

1. **ABC COUNTY RSVP ENROLLMENT FORM**

2. **Please print and complete all sections. Forms with original signatures are required for enrollment.**

Name_____**Birth Date**_____

Mailing Address_____**City**_____**Zip**_____

Phone_____**Cell Phone**_____**Email** _____

Are you a Veteran?_____Yes_____No **Physical/Medical Limitations**:_____

Have you ever been convicted of a **criminal offense or misdemeanor**? Yes____

If Yes, please attach an explanation of charges, date of offense, and status of the charges on a separate sheet to be included with this application.

Driver's License #_____State_____Expiration Date_____

RSVP provides a mileage reimbursement for travel between home and volunteer site to the volunteers.
Will you be claiming a mileage reimbursement for travel to and from your volunteer location? **Yes___ No__**
If Yes, is a copy of your proof of auto insurance showing active coverage attached? Yes ___ No__

As a volunteer of RSVP, you will be covered by accident and personal liability insurance plus a small death benefit while performing volunteer duties. This coverage is automatic and free of cost to you as long as you are an active, enrolled member of RSVP. Please provide the following information.

Emergency Contact_____**Phone**_____

Beneficiary for RSVP Supplemental Accident Insurance:

Name_____**Relationship**_____

Address_____**Phone**_____

Employment Experience_____

Special Skills/Interests/Languages_____

Volunteer Experience (Current, Past, Preferred) _____

Days/Hours Available: Mon___ Tues___ Wed___ Thu___ Fri___ Mornings___Afternoons____

Please indicate if RSVP may have permission to use your likeness?

[ ] I hereby grant ABC County RSVP permission to use my likeness in photograph(s)/video(s) in any and all of its publications or on the world wide web, whether now known or hereafter existing, controlled by RSVP of ABC County in perpetuity. I will make no monetary or other claim against RSVP of ABC County for the use of these photograph(s)/video(s).

[ ] I do not give permission to use my likeness in photograph(s)/video(s) to ABC County RSVP.

Certifications

By signing below, I acknowledge that I have read and understand the following statements:

- I hereby state that I am 55 years of age or older and offer my services as a volunteer for the ABC County Retired Senior Volunteer Program. I understand that I am not an employee of the RSVP Project, the sponsor, ABC County, the volunteer station or the Federal Government and agree to serve without compensation.
- I understand that in my capacity as an RSVP volunteer I may come into contact with confidential information. I agree to protect this information to the best of my ability and not to disclose it during or after my service as a volunteer has ended.
- I understand that if I use my personal automobile in my volunteer service, I will arrange to keep in effect automobile liability insurance equal or greater to the minimum requirements of the state of Xxxx. I will also keep in effect a valid Xxxx Driver's license.

RSVP Volunteer Signature	**Date**	**RSVP Staff Signature**	**Date**

Equal Employment Agency - ABC County RSVP is an equal opportunity Agency. Enrollment is done without regard to race, color, religion, national origin, sex, age or disability. RSVP provides reasonable accommodations to the known disabilities of individuals in compliance with the Americans with Disabilities Act. For accommodation information or if you need special accommodations to complete the application process, please contact ABC County RSVP at (555) 555-1234.

Return completed registration to: (**Original Signatures Required on the Form)**	ABC County RSVP PO Box 123 Our Town, USA 81234	For Questions contact: Jane Doe (555) 555-1234 RSVP.PD@abccounty.gov

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FOR OFFICE USE ONLY:

Appendix 2 This is a sample form. Projects are encouraged to customize as appropriate. All project forms should comply with Senior Corps requirements as well as grantee policies.

The following information is optional and will not affect your enrollment with ABC RSVP

1. **Occasionally ABC RSVP will purchase volunteer recognition gifts to RSVP members. Please share the size you would use on each item blow.**

Item	Size	Item	Size	Item	Size
Jacket		Vest		Hoodie	
Sweatshirt		Hat		Shoe size (for snow cleats)	

2. **Which show of appreciation would mean the most to you? (Check all that apply)**

Specially arranged meals ☐	Gifts ☐	Certificates ☐
ABC RSVP logo wear ☐	Being chosen as the volunteer of the month ☐	Being highlighted in the newsletter ☐
Other (Make suggestion)		

3. **RSVP is often asked to provide demographical information pertaining to volunteer members. Please provide the following information (Optional).**

Are you a Veteran? ____

Are you an active Military Member? _____

Are any of your family members actively serving in the military? _____

(Optional) Gender:
____Male
____Female

(Optional) Race/Ethnic Background:
___White ___Asian ____African-American ____Hispanic/Latino
___American Indian/Alaska Native ___Pacific Islander ___Other

Thank you for any information you have provided. Your information is **never** sold, shared, or used outside of RSVP, ABC County government or the Corporation of National and Community Services.

Appendix 3: Sample Form
Projects are encouraged to customize as appropriate.
All project forms should comply with Senior Corps requirements as well as grantee policies.

ABC COUNTY RSVP

TIMESHEET and MILEAGE REIMBURSEMENT REQUEST

Mailing Address: PO Box 123, Our Town, USA 81234 **Physical Address**: 123 State Street, Our Town, USA 81234
Telephone: (555) 555-1234 Fax: (555) 555-5555

3. **Return to the RSVP Office by the 10th of the following month**

Volunteer Name (Print)_____ Month_____, 20____
Mailing Address_____ City/Zip _____

Station Name_____Auto Insurance Information on File? **Y** or **N**

Date	Volunteer Assignment	# of Hours	^Start Odometer	^End Odometer	Auto miles	*Meals
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
TOTALS						

***Enter an "X" if you received a free meal while volunteering. Leave blank if no meal is received. ^Enter actual start and stop odometer readings for each trip.**

IMPORTANT! Please obtain your volunteer station supervisor's original signature before submitting!

For Office Use Only:

Mileage Reimbursement

_____miles X

_____per mile =

Total Reimbursement:

$

VOLUNTEER: By signing below, I certify that this statement and the amount claimed are true, correct and complete to the best of my knowledge. I certify that I possessed a valid driver's license and that liability insurance in the minimum amount required by law was in force at the time of this travel. **STATION SUPERVISOR:** By signing below, I certify that to the best of my knowledge this claim is correct and true.

X_____ **X**_____ **X**_____
RSVP Volunteer Signature Date **Station Supervisor Signature Date** **RSVP Staff Signature Date**

Appendix 4: SAMPLE FORM
Projects are encouraged to customize as appropriate.
All project forms should comply with Senior Corps requirements as well as grantee policies.

Sponsor Logo Here

ABC COUNTY RSVP

Mailing Address: PO Box 123, Our Town, XX 81234
Physical Address: 123 State St., Our Town, XX 81234
Telephone: (555) 555-1234
5. **Fax**: (555) 555-5555

Volunteer Assignment Description

Volunteer Station: _____

Title of Volunteer Assignment: _____

Basic volunteer duties involved with this assignment:

1 _____

_____

2 _____

_____

3 _____

Who will be served by this assignment?

_____

_____

What is the anticipated benefit of this volunteer service to those receiving the service?

_____

_____

What specific skills will the volunteer need? (Include any requirements for lifting, standing, or other physical requirements.)

_____

_____

Name of person providing this information:	
Telephone:	Fax:
Email:	Date:
Acceptance by RSVP Project Staff:	Date:

Letters of Agreement for In-Home Assignments

Requirements:

(1) According to 45 CFR 2553.62(c) volunteer stations managing assignments in private homes must develop a Letter of Agreement describing and authorizing the RSVP volunteer activities in each home **(See a sample letter below**). The requirement for Letters of Agreement must be incorporated in the Memorandum of Understanding.

(2) Letters of Agreement contain a statement authorizing an RSVP volunteer assignment in a person's home and designating the activities to be performed. The Agreement also defines arrangements for days and hours of service and the specific plan for the RSVP volunteer's supervision. The person to be served (or their legal guardian), the volunteer station, and the sponsor sign the letter of agreement.

(3) The Letter of Agreement provides a common understanding of what the senior volunteer will and will not do while on an in-home assignment. Such an agreement is not required for casual or friendly visiting that is not part of a regular, ongoing program of activities organized by a volunteer station. For example, the delivery of meals to a home would normally not require a Letter of Agreement.

(4) Projects working with organizations, such as hospices, which have obtained Letters of Agreement, or equivalent written agreements with their individual clients, may sign general letters of agreement covering all of the organization's home based clients, rather than obtaining individual letters for each person. The Memorandum of Understanding with the volunteer station must reference any such agreements.

(5) It is strongly recommended that sponsors establish policies to ensure that criminal history checks are performed for RSVP volunteers who will have contact on a recurring basis with children, frail adults, persons with disabilities or other potentially vulnerable individuals. Name checks of volunteers can be performed at the National Sex Offender Public Website, www.nsopw.gov, maintained by the U.S. Department of Justice. See NSCHC webpage for more information about criminal history checks.

Sample Letter: (see following page)

Appendix 5: SAMPLE FORM

Projects are encouraged to customize as appropriate.

RSVP

Letter of Agreement for In-Home Assignment

_____ RSVP has been asked by
_____ to place
(Volunteer Station)

_____ in the home of
(Name of RSVP volunteer)

_____.
(Name) (Address)

The following services have been approved by the volunteer station staff and will be performed by the RSVP volunteer _____
_____
_____

The Volunteer Station Supervisor for this assignment is: _____
The RSVP volunteer will serve
_____
(Day(s) of the Week)from _____ to____(Approximate Service Schedule)

Volunteer services may be terminated by the sponsor at any time upon request of any of the undersigned parties.

Signed: _____
Sponsor Representative Date

_____
Volunteer Station Representative Date

_____
Person Served or Legally Responsible Person Date

_____
RSVP Volunteer Date

Appendix 6: SAMPLE FORM.

Projects are encouraged to customize as appropriate.

ABC Non-Profit
RSVP Program
RSVP Project Director Job Description

JOB TITLE: RSVP Project Director

REPORTS TO: Executive Director

STATUS: Full Time

POSITION DESCRIPTION:
Under the general direction of the Executive Director of ABC Non-Profit and the Corporation for National and Community Service (CNCS) program policy guidelines, the RSVP Director has full-time responsibility for the development and operation of the Retired and Senior Volunteer Programs; in coordination with the ABC Non-Profit and Senior Corps Program Advisory Council.

PROJECT DIRECTOR'S ROLE:
The RSVP Project Director is responsible for the daily management of the RSVP. The RSVP Project Director functions as a working project manager, actively involved with community organizations, RSVP volunteers, and volunteer stations. The RSVP Project Director serves as the representative of the sponsor in signing and approving official project documentation, including project reports, memoranda of understanding, letters of agreement for in-home assignments. The RSVP Project Director will abide by ABC Non-Profit's established procedures for internal review and its standard policies and procedures.

The RSVP Project Director serves full time, as negotiated with the CNCS. The RSVP Project Director may participate in activities to coordinate RSVP program resources with those of related local agencies, boards, or organizations.

RESPONSIBILITIES:
Under direction of the ABC Non-Profit Executive Director, the RSVP Project Director's duties include, but are not limited to:

a) Plan and develop all phases of RSVP operations;
b) Assist with hiring, training, and supervising adequate RSVP staff to efficiently carry out, maintain and develop operations of the RSVP Program;
c) Adhere to and administer personnel policies and procedures for RSVP staff consistent with those of ABC Non-Profit;
d) Provide support, information and materials for RSVP coordinators and appraise staff performance according to ABC Non-Profit personnel policies and procedures;
e) Recruit, select, orient and place RSVP volunteers with volunteer stations;
f) Develop and maintain appropriate fiscal, personnel, program and volunteer records and reports;
g) Enhance the total efforts of RSVP through active involvement with community organizations, other national service programs, where appropriate;

h) Implement agreed upon performance measure and other RSVP grant requirements;
i) Keep Senior Corps Advisory Council members informed and solicit their participation and advice on matters affecting program operations;
j) Work in cooperation with ABC Non-Profit staff, Advisory Council members and volunteer station staff to obtain resources for programs;
k) Plan, develop, and implement ongoing public relations opportunities, including social media, in cooperation with ABC Non-Profit;
l) Arrange for formal and regular recognition of volunteers, organizations and individuals who have contributed to the support of RSVP;
m) Assure volunteer orientation, in conjunction with volunteer work stations and staff;
n) In conjunction with RSVP staff, develop and maintain close coordination and relationships with RSVP volunteer stations, including development of volunteer assignment plans;
o) Provide ongoing support to volunteers;
p) In conjunction with RSVP staff, appraise volunteer performance;
q) Assess appropriateness and/or performance of volunteer stations;
r) Attend training conferences conducted or authorized by the CNCS.

JOB QUALIFICATIONS:
Bachelor's Degree, training and/or experience in work with those over 55 years of age and volunteers is essential. Flexibility, management skills, computer literacy, and personal transportation are requirements. Experience managing federal grants is preferred. Must have excellent written and oral communication skills necessary for preparing grants, written reports and giving oral presentations and trainings. Ability to attend after hours and weekend meetings/events is required. Regional travel is a requirement of this position.

_____
RSVP Project Director Date

_____
Executive Director Date

Appendix 7: SAMPLE FORM
Projects are encouraged to customize as appropriate.

[Enter new or changed information and attach to volunteer registration]

RSVP Volunteer Information Update

RSVP [Project Name] _____

1. Name: _____

   Address: _____

   City: _____ Zip: _____ Telephone: _____

   Email: _____

2. Name of Beneficiary: _____

   Relationship: _____ Telephone: _____

   Address: _____

   City: _____ State: _____ Zip Code: _____

3. Change in station assignment or volunteer assignment: _____

4. Other changes:

   Current Information: _____

   Changes to: _____

   _____

Volunteer Signature: _____ Date: _____

Staff Notes: _____

_____

RSVP Staff Initials: _____ Date: _____

Appendix 8: SAMPLE FORM
Projects are encouraged to customize as appropriate.

Sample Annual Safety Assurance Email

This is a sample of the type of email a sponsor may use to annually assess volunteer placements to ensure the safety of volunteers. An email assurance from each volunteer station is one way to be in compliance with 45 CFR §2553.23(c)(3).

Dear [Station Supervisor].

As an RSVP partner station, we rely on you to adequately provide for the safety of RSVP volunteers serving at your non-profit organization.

Please respond to this email confirming that appropriate measures are in place to ensure the safety of RSVP volunteers serving at your station. Appropriate measures may include: clearly marked exits, posted fire escape routes, accessible entrances, safety training, etc.

If you have any questions or concerns, please contact me.

Thank you,

RSVP Project Director

Appendix 9: SAMPLE FORM
Projects are encouraged to customize as appropriate.

[Optional] Checklist for Station Accessibility

This questionnaire is designed to allow evaluation of the overall accessibility of the *ABC* RSVP program by looking at where we send volunteers to serve. It is not meant to eliminate stations for possible placement of RSVP volunteers but to provide information needed to match volunteers with volunteer stations.

Organization Name_____

		No	Yes	Comments
1	Is there a flat, non-gravel route from parking/street through the front entrance? Does the parking lot have spaces reserved for persons with disabilities?			
2	Are doors (entrance, rest room, etc.) no heavier to open than refrigerator door? Are door knobs throughout push/pull or lever-type, not twist knobs?			
3	Are halls and passageways at least one yard wide? Are they level, with non-slip stable surfaces and no trip hazards?			
4	Are there no steps without alternate routes (elevators, ramps, other entrance) available? Are stairs of uniform heights?			
5	Is there adequate maneuvering clearance at entrances, especially rest rooms?			
6	Does an accessible restroom have an accessible stall 5’ x 5’? (There are other legal configurations, but check to see if a person in a wheelchair can close the door)			
7	Does an accessible restroom have a sink with level faucets, hot water pipes wrapped to prevent burns, and paper towels lowered?			
8	Are emergency alarms both audible and visual? Are evacuation plans and areas of rescue assistance accessible to individuals with mobility impairments?			
9	Do policies, practices or standards – either formal or informal- have the direct or indirect effect of excluding or limiting the participation of individuals with disabilities in your organization’s program or activities?			
10	Do policies exist that ensure that a “reasonable accommodation” is made to individuals, including volunteers, with disabilities?			

_____ _____

Name/Signature of person completing checklist Date

Appendix 10: Optional Worksheet
Projects are encouraged to customize as appropriate.

Space Cost Computation Worksheet
For Corporation for National & Community Service Grantees

This ***optional*** work sheet is for your use in computing the space cost allowance under the terms of your application for CNCS funding. Completion of this worksheet will expedite CNCS approval of the space cost in the proposed budget.

Basis for charging a direct cost as a percent:
Grantees may charge shared cost, such as space, utilities, etc. to the grant as a direct charge or they can incorporate those cost into their indirect cost rate. If part of the indirect cost rate, then it may not also be charged as a direct cost. If it charged directly (has its own line item) the percentage charged to the grant must have a cost basis, such as a space allocation plan for charging rent, the budget narrative should reflect how they arrived at the percentage and it should be applied consistently. The grantee must be able to allocate any shared cost to the CNCS grant. This is particularly important if the cost is picked during an IPERA review or other audit and the grantee is asked to document how they arrived at the amount charged to the grant.

Only one of the following methods numbered below (2, 3, or 4) may be used to determine the space cost allowance. If federal funds are provided to the grantee by a federal agency other than CNCS for any portion of the space used by CNCS, the grantee cannot charge space costs as grantee match on the CNCS application.

LOCATION: _____

1. Total Facility Space___Sq. Ft. Total CNCS Space_____Sq. Ft.

a. Percent of CNCS Space to Total Facility Equals_____%

RENTAL

2. If your organization pays rent for the facilities in which the CNCS program is housed, what is the rent for the entire facility? _

a. To arrive at the rent allowance for the CNCS space, multiply the cost for the entire space by the percent in 1.a above.

$_____per month; $_____per budget period

SPACE OWNERSHIP

3. If your organization owns the facilities in which the CNCS program is housed, either the Use Charge or Depreciation method can be used to determine cost.

What was the acquisition cost of the facility? $_____

a. To calculate the Use Charge, multiply as annual rate not exceeding 2% of the acquisition cost times the percent in 1.a above. $_____

b. To calculate the Depreciation allowance, multiply the percent arrived at in 1.a times your depreciation factor (i.e. acquisition cost-useful life) on the space.

_____X_____= $_____

DONATED PROPERTY

4. If a third party owns the facilities in which the CNCS program is housed, obtain an appraised value from an independent appraiser in your community-based on a rate per square foot. $_____

a. To arrive at the allowable cost using this method, multiply that rate by the CNCS space in 1.a.

_____rate X_____% = $_____

Appendix 11 is the Fundraising Frequently Asked Questions document. This document is still in development and will be posted once it is finalized.

Appendix 12: 2016 Assurances

The most current version of the Assurances can be found on the "Authorize and Submit" link in electronic grant applications.

ASSURANCES

As the duly authorized representative of the applicant, I certify, to the best of my knowledge and belief, that the applicant:

* Has the legal authority to apply for federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-federal share of project costs) to ensure proper planning, management, and completion of the project described in this application.
* Will give the awarding agency, the Comptroller General of the United States, and if appropriate, the state, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
* Will establish safeguards to prohibit employees from using their position for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
* Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
* Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 CFR 900, Subpart F).
* Will comply with all federal statutes relating to nondiscrimination. These include but are not limited to: Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681-1683, and 1685-1686). which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), which prohibits discrimination on the basis of disability (d) The Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107), which prohibits discrimination on the basis of age; (e) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) sections 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290dd-3 and 290ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the National and Community Service Act of 1990, as amended; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
* Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of federal participation in purchases.
* Will comply with the provisions of the Hatch Act (5 U.S.C. 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
* Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C 276a and 276a-77), the Copeland Act (40 U.S.C 276c and 18 U.S.C. 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333), regarding labor standards for Federally assisted construction sub-agreements.
* Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires the recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.
* Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved state management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C 1451 et seq.); (f) conformity of federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
* Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
* Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16U.S.C. 469a-l et seq.).

* Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
* Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
* Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
* Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984, as amended, and OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations.
* Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, application guidelines, and policies governing this program.

For AmeriCorps State and National Applicants ONLY

*If you are not applying for a grant through AmeriCorps*State and National, you may ignore this section.*

1. Will comply with all rules regarding prohibited activities, including those stated in applicable Notice, grant provisions, and program regulations, and will ensure that no assistance made available by the Corporation will be used to support any such prohibited activities.

2. Will comply with the nondiscrimination provisions in the national service laws, which provide that an individual with responsibility for the operation of a project or program that receives assistance under the national service laws shall not discriminate against a participant in, or member of the staff of, such project or program on the basis of race, color, national origin, sex, age, political affiliation, disability, or on the basis of religion. (NOTE: the prohibition on religious discrimination does not apply to the employment of any staff member paid with non-Corporation funds or paid with Corporation funds but employed with the organization operating the project prior to or on the date the grant was awarded. If your organization is a faith-based organization that makes hiring decisions on the basis of religious belief, your organization may be entitled, under the Religious Freedom Restoration Act, 42 U.S.C. § 2000bb, to receive federal funds and yet maintain that hiring practice, even though the national service legislation includes a restriction on religious discrimination in employment of staff hired to work on a Corporation-funded project and paid with Corporation grant funds. (42 U.S.C. §§ 5057(c) and 12635(c)). For the circumstances under which this may occur, please see the document "Effect of the Religious Freedom Restoration Act on Faith-Based Applicants for Grants" on the Corporation's website at: http://www.usdoj.gov/archive/fbci/effect-rfra.pdf.

3. Will comply with all other federal statutes relating to nondiscrimination, including any self-evaluation requirements. These include but are not limited to: (a)Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681-1683, and 1685-1686). which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), which prohibits discrimination on the basis of handicaps (d) The Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107), which prohibits discrimination on the basis of age; (e) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) sections 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; and (i) the requirements of any other nondiscrimination statute(s) which may apply to the application.

4. Will provide, in the design, recruitment, and operation of any AmeriCorps program, for broad-based input from – (1) the community served, the municipality and government of the county (if appropriate) in which the community is located, and potential participants in the program; and (2) community-based agencies with a demonstrated record of experience in providing services and local labor organizations representing employees of service sponsors, if these entities exist in the area to be served by the program;

5. Will, prior to the placement of participants, consult with the appropriate local labor organization, if any, representing employees in the area who are engaged in the same or similar work as that proposed to be carried out by an AmeriCorps program, to ensure compliance with the nondisplacement requirements specified in section 177 of the NCSA;

6. Will, in the case of an AmeriCorps program that is not funded through a State, consult with and coordinate activities with the State Commission for the state in which the program operates.

7. Will ensure that any national service program carried out by the applicant using assistance provided under section 121 of the National and Community Service Act of 1990 and any national service program supported by a grant made by the applicant using such assistance will address unmet human, educational, environmental, or public safety needs through services that provide a direct benefit to the community in which the service is performed;

8. Will comply with the nonduplication and nondisplacement requirements set out in section 177 of the National and Community Service Act of 1990, and in the Corporation's regulations at § 2540.100;

9. Will comply with the grievance procedure requirements as set out in section 176(f) of the National and Community Service Act of 1990 and in the Corporation's regulations at 45 CFR § 2540.230;

10. Will provide participants in the national service program with the training, skills, and knowledge necessary for the projects that participants are called upon to perform;

11. Will provide support services to participants, such as information regarding G.E.D. attainment and post-service employment, and, if appropriate, opportunities for participants to reflect on their service experiences;

12. Will arrange for an independent evaluation of any national service program carried out using assistance provided to the applicant under section 121 of the National and Community Service Act of 1990 or, with the approval of the Corporation, conduct an internal evaluation of the program;

13. Will apply measurable performance goals and evaluation methods, which are to be used as part of such evaluation to determine the program's impact on communities and persons served by the program, on participants who take part in the projects, and in other such areas as required by the Corporation;

14. Will ensure the provision of a living allowance and other benefits to participants as required by the Corporation;

15. Has not violated a Federal criminal statute;

16. If a state applicant, will ensure that the State subgrants will be used to support national service programs selected by the State on a competitive basis;

17. If a state applicant, will seek to ensure an equitable allocation within the State of assistance and approved national service positions, taking into consideration such factors as the locations of the programs, population density, and economic distress;

18. If a state applicant, will ensure that not less than 60% of the assistance will be used to make grants to support national service programs other than those carried out by a State agency, unless the Corporation approves otherwise.

For Learn and Serve America Applicants ONLY

If you are not applying for a grant through Learn and Serve America, you may disregard this section.

2. Will keep such records and provide such information to the Corporation with respect to the programs as may be required for fiscal audits and program evaluation.

3. Will comply with the nonduplication, nondisplacement, and grievance procedure requirements of 45 CFR Part 2540.

2. Will, prior to the placement of a participant, consult with the appropriate local labor organization, if any, representing employees in the area who are engaged in the same or similar work as that proposed to be carried out by the program, to prevent the displacement and protect the rights of those employees.

3. Will comply with the 45 CFR 2540.200-207 criminal history check requirements for all individuals receiving a living allowance, stipend, national service educational award, or salary through a program receiving assistance under the national service laws—regardless of the type of service the individual is performing or the individual's access to vulnerable populations.

4. Will comply with the parental involvement requirements 45 CFR 2540.330.

5. Will, for school-based grants, make efforts to:
1. ensure that students of different ages, races, sexes, ethnic groups, disabilities, and economic backgrounds have opportunities to serve together;
2. include any opportunities for students, enrolled in schools or programs of education providing elementary or secondary education, to participate in service-learning programs and ensure that such service-learning programs include opportunities for such students to serve together;
3. involve participants in the design and operation of the programs;
4. promote service-learning in areas of greatest need, including low-income or rural areas; and
5. otherwise integrate service opportunities into the academic program of the participants.

Appendix 12: 2016 Assurances

The most current version of the Assurances can be found on the "Authorize and Submit" link in electronic grant applications.

For Social Innovation Fund Applicants ONLY

If you are not applying for a Social Innovation Fund grant, you may disregard this section.

- Will use the funds received through the award in order to make subgrants to community organizations that will use the funds to replicate or expand proven initiatives, or support new initiatives, in low-income communities.

- Will consult with a diverse cross section of community representatives in making decisions about subgrants for communities (including individuals from the public, nonprofit private, and for-profit private sectors).

- Will make subgrants of a sufficient size and scope to enable the community organizations to build their capacity to manage initiatives, and sustain replication or expansion of the initiatives;

- Will not make any subgrants to--
- the parent organizations of the applicant,
- a subsidiary organization of the parent organization of the applicant, or,
- if the applicant applied for a SIF award as a partnership, any member of the partnership.

- Commits to meeting the matching fund requirements of section 198k(i) of the National and Community Service Act of 1990 (42 U.S.C. §12653k(i)).

1. Commits to use data and evaluations to improve the applicant's own model and to improve the initiatives funded by the applicant.

2. Commits cooperate with any evaluation activities undertaken by the Corporation.

3. Has adopted and implemented standard of conduct policies and procedures in regard to procurements which meet the requirements of either 45 C.F.R. §2541.360(b)(3), or 2 C.F.R. §215.42 and 45 C.F.R. §2543.42.

4. Has adopted and implemented policies and procedures in regard to the applicant's subgrant competitions which will provide reasonable assurance that conflicts of interest (or appearances of conflicts of interest) on the part of reviewers or decision-makers are identified and appropriately mitigated.

Appendix 13: 2016 Certifications

The most current version of the Certification can be found on the "Authorize and Submit" link in Senior Corps electronic grant applications.

CERTIFICATIONS

Certification – Debarment, Suspension, and Other Responsibility Matters

This certification is required by the government-wide regulations implementing Executive Order 12549, Debarment and Suspension, 2 CFR Part 180, Section 180.335, *What information must I provide before entering into a covered transaction with a Federal agency?*

As the duly authorized representative of the applicant, I certify, to the best of my knowledge and belief, that neither the applicant nor its principals:

- Is presently excluded or disqualified;
- Has been convicted within the preceding three years of any of the offenses listed in § 180.800(a) or had a civil judgment rendered against it for one of those offenses within that time period;
- Is presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission or any of the offenses listed in § 180.800(a); or
- Has had one or more public transactions (Federal, State, or local) terminated within the preceding three years for cause or default.

Certification – Drug Free Workplace

This certification is required by the Corporation's regulations implementing sections 5150-5160 of the Drug-Free Workplace Act of 1988 (P.L. 100-690), 45 CFR Part 2545, Subpart B. The regulations require certification by grantees, prior to award, that they will make a good faith effort, on a continuing basis, to maintain a drug-free workplace. The certification set out below is a material representation of fact upon which reliance will be placed when the agency determines to award the grant. False certification or violation of the certification may be grounds for suspension of payments, suspension or termination of grants, or government-wide suspension or debarment (see 2 CFR Part 180, Subparts G and H).

As the duly authorized representative of the grantee, I certify, to the best of my knowledge and belief, that the grantee will provide a drug-free workplace by:

A. Publishing a drug-free workplace statement that:
a. Notifies employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace;
b. Specifies the actions that the grantee will take against employees for violating that prohibition; and
c. Informs employees that, as a condition of employment under any award, each employee will abide by the terms of the statement and notify the grantee in writing if the employee is convicted for a violation of a criminal drug statute occurring in the workplace within five days of the conviction;

B. Requiring that a copy of the statement described in paragraph (A) be given to each employee who will be engaged in the performance of any Federal award;

C. Establishing a drug-free awareness program to inform employees about:
a. The dangers of drug abuse in the workplace;
b. The grantee's policy of maintaining a drug-free workplace;
c. Any available drug counseling, rehabilitation, and employee assistance programs; and
d. The penalties that the grantee may impose upon them for drug abuse violations occurring in the workplace;

D. Providing us, as well as any other Federal agency on whose award the convicted employee was working, with written notification within 10 calendar days of learning that an employee has been convicted of a drug violation in the workplace;

E. Taking one of the following actions within 30 calendar days of learning that an employee has been convicted of a drug violation in the workplace:
a. Taking appropriate personnel action against the employee, up to and including termination; or
b. Requiring that the employee participate satisfactorily in a drug abuse assistance or rehabilitation program approved for these purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

F. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (A) through (E).

Certification - Lobbying Activities

As required by Section 1352, Title 31 of the U.S. Code, as the duly authorized representative of the applicant, I certify, to the best of my knowledge and belief, that:

Appendix 13: 2016 Certifications

The most current version of the Certification can be found on the "Authorize and Submit" link in Senior Corps electronic grant applications.

- No federal appropriated funds have been paid or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer of Congress in connection with the awarding of any federal contract, the making of any federal loan, the entering into of any cooperative agreement, or modification of any federal contract, grant, loan, or cooperative agreement;
- If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the applicant will submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;
- The applicant will require that the language of this certification be included in the award documents for all subcontracts at all tiers (including subcontracts, subgrants, and contracts under grants, loans and cooperative agreements) and that all subrecipients will certify and disclose accordingly.

Certification - Grant Review Process (State Commissions Only)
I certify that in conducting our review process, we have ensured compliance with the National and Community Service Act of 1990, the Corporation's peer review requirements, and all state laws and conflict of interest rules.

For AmeriCorps State and National Applicants ONLY

*If you are not applying for a grant through AmeriCorps*State and National, you may ignore this section.*

Erroneous certification or assurance
The assurances and certifications are material representations of fact upon which we rely in determining whether to enter into this transaction. If we later determine that you knowingly submitted an erroneous certification or assurance, in addition to other remedies available to the federal government, we may terminate this transaction for cause or default.

Notice of error in certification or assurance
You must provide immediate written notice to us if at any time you learn that a certification or assurance was erroneous when submitted or has become erroneous because of changed circumstances.

Definitions
The terms "debarment", "suspension", "excluded", "disqualified", "ineligible", "participant", "person", "principal", "proposal", and "voluntarily excluded" as used in this document have the meanings set out in 2 CFR Part 180, subpart I, "Definitions." A transaction shall be considered a "covered transaction" if it meets the definition in 2 CFR part 180 subpart B, "Covered Transactions."

Assurance requirement for subgrant agreements
You agree by submitting this proposal that if we approve your application you shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by us.

Assurance inclusion in subgrant agreements
You agree by submitting this proposal that you will obtain an assurance from prospective participants in all lower tier covered transactions and in all solicitations for lower tier covered transactions that the participants are not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction.

Assurance of subgrant principals
You may rely upon an assurance of a prospective participant in a lower-tier covered transaction that is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless you know that the assurance is erroneous. You may decide the method and frequency by which you determine the eligibility of your principals. You may, but are not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

Non-assurance in subgrant agreements
If you knowingly enter into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the federal government, we may terminate this transaction for cause or default.

Prudent person standard
Nothing contained in the aforementioned may be construed to require establishment of a system of records in order to render in good faith the assurances and certifications required. Your knowledge and information is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

Guidance on Recognition Costs

From the CNCS Field Financial Management Center (FFMC)

Overview

Recognition is a cost allowed by Senior Corps regulations 45 CFR 2500 that covers a wide range of potential costs; any costs charged to this direct benefit to the volunteer must be in accordance with the applicable OMB cost principles (2 CFR Part 220 formally OMB Circular A21, 2 CFR Part 225 formally OMB Circular A87, and 2 CFR Part 230 formally OMB CircularA-122) and also expended using sound business practices. Any costs charged to recognition should be reasonable and prudent, properly valued and consistent with your organizational accounting practices. Consideration should also be given to the appropriateness of the expenditure.

Criteria

- Recognition should be related to the volunteer's service.

- Recognition costs should have appropriate limits. Things to consider are budgetary limits and organizational policies on reasonableness of costs. If your organization does not have a policy on reasonableness of costs, one should be developed by your management and/or accounting department.

- Recognition should be applied equally among all volunteers. If there are limited resources some method should be devised to insure all volunteers are included in recognition activities and actions. Planning for distribution of limited resources should be accomplished at the time of your budgetary planning and included in your organizational policies and procedures.

- Recognition should be program specific and recognize the Senior Corps volunteer for their service in the CNCS designated project.

- Recognition should not include any costs to the volunteer.

- Recognition should take place at least annually for formal public recognition of volunteers to the community. If formal recognition takes place, a sign-in sheet documenting attendance of the volunteers being recognized should be prepared.

Items Generally Accepted as Recognition Expenses

- Special ceremonies, teas, breakfasts, luncheons, and recreational outings, can also include a per person cost which includes items other than room rental and food. If the cost per attendee includes other amenities in an inclusive package this is acceptable so long as:
  - the cost is reasonable;

- there is budgetary availability; and
- the expenses are not expressly prohibited by either the OMB cost principles or a determination by a CNCS Official.

- Small (nominal value) gifts are allowable:
- So long as:
  - the cost is reasonable;
  - there is budgetary availability; and
  - the gift is not something that is expressly prohibited by either OMB cost principles or by a determination by a CNCS Official.
- A gift is any item that has monetary value.
- Your organization should establish policies on how you determine reasonableness of cost and determine limits based on sound accounting practices.
  - CNCS would define the value of a gift using "Market Value" *Market value* means the retail cost the organization would incur to purchase the gift.
  - An organization who cannot ascertain the market value of a gift may estimate its market value by reference to the retail cost of similar items of like quality.
  - For example: The market value of a gift of a ticket entitling the holder to food, refreshments, entertainment, or any other benefit would be the face value of the ticket.

- Recognition items such as trophies, plaques, certificates, and pins are acceptable. Attention should be given to the fact that the cost of some of these items will increase depending on the cost of engraving, sometimes significantly, so these recognition items may be limited to budget availability.

- Birthday cards are acceptable, even though they are not technically a recognition item related to a volunteer's service, they are of a nominal value and therefore can be used as a form of recognition.

- Gifts cards are acceptable forms of recognition. It is important that these should be treated as cash in your accounting system, however, they do not take the form of a cash payment and are not as liquid.
- Because anyone can use a gift card, they should be treated as cash and documented in accordance with sound business practices, including a receipt signed by the volunteer being recognized.
- Refer to 45 CFR 2543.21 for Standards for Financial Management Systems. Gift Cards are usually designated for a specific purpose and a specific item. Organizations should have a policy and procedure in place to account for the distributions and accounting of gift cards.

Items Generally NOT Acceptable Forms of Recognition

- Holiday or Christmas gifts are not acceptable. Recognition should be based on a volunteer's service only.

- Cash is not acceptable as recognition. Cash can be seen as a payment or a bonus and volunteers serving in CNCS programs are not to be paid other than the allowable stipend payments in the CNCS Foster Grandparent / Senior Companion programs.

- Paid Speakers at recognition events are usually not allowable, although exceptions may be permitted. Some things to consider are:
  - Would the event still be a success if the speaker does not attend? Is the speaker an integral and vital component to the success of the event?
  - Would your organization pay for the speaker or raise money to include the speaker if federal funds were not available?
  - Can you substitute the speaker for someone without a speaking fee but with similar ability and qualifications?

- Guests are not permitted to be paid for from federal or non-federal expenditures. If guests are invited, the sources of funds to be used should come from a source not counted toward your required match. A best practice is to have a sign in sheet for all attendees present at the recognition event.

- Certain forms of entertainment are not acceptable. If you are planning to expend funds for recognition please consult with a CNCS State Office representative and your Grants Officer prior to expenditure for further clarification.

Items that are questionable and would need prior approval from CNCS

- Tickets to events in normal instances would be deemed unallowable based on the OMB Cost Principles which state *"Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable."*

- However since our regulations do view recognition as a legitimate cost, showing recognition in the form of tickets to events may be deemed appropriate based on reasonableness of cost and appropriateness of the venue. These type of costs should be discussed with your CNCS State Program Office representative and Grants Officer prior to expenditure

Appendix 14

Special Volunteer Recognition

- Singling out a volunteer for exceptional or special service.
  - Acknowledging a milestone in service (example: 20 years of service, 30 years of service).

- Special recognition items can be given for this purpose if the following is demonstrated:
  - the cost is reasonable;
  - there is budgetary availability; and
  - the gift is not something that is expressly prohibited by either OMB cost principles or by a determination by a CNCS Official.

- When recognizing individual volunteers, an organization should have a written policy that includes:
  - what constitutes exceptional or special service;
  - which milestones or years in service will receive special recognition; and
  - which items will be given for this purpose if different than typical recognition awards.

PRIMER ON CIVIL RIGHTS COMPLIANCE

Civil rights laws are complex, and **neither direct evidence of discrimination nor direct proof of intent to discriminate is needed for discrimination to be found.** Therefore, past actions -- e.g., patterns in decisions, statements made in any contexts, or rules followed/not followed -- or actions taken regarding other persons -- e.g., sent to training, given warning in lieu of a reprimand or termination -- may determine the outcome of a claim of discrimination, even if the past action appears to have no relationship to a present discrimination claim.

Definition of Discrimination

Dictionary Definition: Different treatment

Legal Definition: Different treatment **because of** a difference in race, color, religion, sex, national origin, age, mental or physical disability, sexual orientation, or political affiliation

Regulatory Expansion: Different treatment **because of** reprisal for: (a) participation in the discrimination complaint process, or (b) expressing opposition to an action made illegal by the civil rights acts or other applicable laws.

Determination of Discrimination

When direct, straightforward evidence of discrimination exists, it is relatively easy to determine whether legally discrimination occurred. Such evidence could include:

— Racial epithets, sexual slurs, repeated jokes about accent or heritage.

— A recruitment brochure which describes a job as "Fit for a Queen," or a recruitment poster asks, "Are you the right man?"

— Interview notes read "too old for this job" or qualification requirements call for "trainee between the ages of 21 and 24."

Such evidence is not needed, however, for discrimination under the law to have occurred. Discrimination may be inferred when two persons of different race, sex, etc. groups receive different treatment. Different treatment is determined by comparing persons who are **similarly situated**, i.e., they are so situated that it is reasonable to expect they would receive the same treatment in the context of a particular employment or service decision.

The determination as to whether an action was **because of** race, sex, etc., uses the following disparate treatment analytical model:

Step One: Complainant must establish a "prima facie" case of discrimination, i.e., establish enough so that the case is not immediately dismissed and the employer or grantee must respond to the allegation(s). This establishes a rebuttable presumption of discrimination. Often comparative evidence is presented that a similarly situated person of another race, sex, etc. group was treated more favorably than the complainant. That is, the complainant was treated less favorably than a person who is so situated that it is reasonable to expect he or she would receive the same treatment in terms of a particular employment or service decision.

If the complainant establishes a prima facie case, the employer's or grantee's response is examined. If the complainant does not do so, a finding of no discrimination must be made.

Step Two: **The employer or grantee must set forth a legitimate, nondiscriminatory reason** for its action. If the employer or grantee does this, pretext is examined. If employer or grantee does not do so, a finding of discrimination must be made.

6. **Step Three:** The complainant must establish the employer's or grantee's stated reason is pretext for prohibited discrimination, i.e., stated reason is not credible or it masks/cloaks the real reason which is prohibited discrimination. If the complainant establishes pretext, a finding of discrimination must be made. If the complainant does not do so, a finding of no discrimination must be made.

Burden of Proof

Generally, the **complainant carries the burden of proof** and must establish his or her case by a **preponderance of the evidence**, i.e., if evidence is a football field, complainant must carry the ball over the 50 yard line, into the employer's territory.

Exception One: Direct, straightforward evidence of discrimination shifts burden of proof to the employer or grantee, who must prove it did not discriminate by clear and convincing evidence (a much higher standard than preponderance of the evidence)

7. **Exception Two: Mixed motive cases** (both discriminatory and nondiscriminatory motives established). The employer or grantee must prove, by the higher level clear and convincing evidence, that, absent discrimination, the same action would have occurred (e.g., same person would have been selected); if the employer or grantee meets its burden of proof, it is still liable for discrimination, but relief is limited to declaratory relief, certain injunctive relief, and attorney's fees and costs (relief may not include personal relief such as retroactive hiring, reinstatement, and compensatory damages)

Interview Questions

Interview or application questions (i.e., questions during the selection process) which are not directly job- or position-related are oftentimes considered direct evidence of discrimination. (There is no problem requesting necessary information **after** the selection process is complete, however.)

At a minimum, to protect from liability, it is **always** advisable to avoid certain types of questions during the selection process. If a manager does not have information available during the selection process, the manager will **always** be able to legitimately state that the selection was not based on that information.

Non job- or position-related questions, i.e., questions that do not directly address the applicant's ability to perform the essential duties of the position, include the following:

- **Questions related to marital status** (also preferred forms of address).
- **Questions related to children** (also ages of children and child care arrangements made or needed) or to pregnancy and/or reproduction (including future family planning).
- **Questions related to the ability to work overtime or to travel** (with reference to dependents or family life). When overtime and/or travel are duties of the position, it is acceptable, however, to describe duties and ask if applicant foresees any problem in fulfilling the duties.
- **Questions related to disability or medical conditions** (including questions on nature or origin of a disability, commuting arrangements, sick leave usage, or ability to perform marginal duties of the position).

Special Requirements Related to Disability or Medical Conditions

General Rule: The employer or grantee **may not** conduct a pre-employment or pre-service medical examination or ask applicant prior to employment or service **whether he or she has disabilities or question the nature or severity of a disability.**

Essential Functions

The employer or grantee may, however, make pre-employment or pre-service inquiry into applicant's ability to meet the *essential functions* of the position, with or without reasonable accommodation, or to fulfill bona fide medical qualification requirements, if applicable.

Essential functions are the minimum abilities necessary for safe and efficient performance of the duties of the position in question.

Care must be exercised, however, in inquiring about the ability to perform essential functions, with or without reasonable accommodation, because a selection decision may not generally consider whether an accommodation is required or how much it will cost. That is, **unless** an accommodation constitutes an undue financial or administrative burden or fundamentally alters the nature of the program or activity, the need for or cost of an accommodation may not influence a selection decision.

It is acceptable to exclude an applicant with a disability, even though the person can perform the essential functions of the position, **only if** the disability endangers the health and safety of others **or** if performing the essential functions endangers the health and safety of the applicant.

Persons with contagious diseases (e.g., tuberculosis) in remission may not be passed over for selection based on their disability if they can perform the essential functions of the position. Further, all HIV-positive persons are persons with disabilities, and not selecting an applicant solely on the basis of this illness is discrimination.

Medical Examinations

Nothing prohibits employer or grantee from conditioning offer of employment or service on results of a medical examination conducted prior to person's entrance on duty, **provided all entering persons are subjected to such an examination regardless of disability** and results of such an examination are used only in accordance with these guidelines.

Records Maintenance

Information concerning the medical condition or history of applicants must be collected and maintained on separate forms that are treated as confidential medical records, except that:

— Supervisors and managers may be informed regarding restrictions on duties of disabled persons and necessary accommodations;

— First aid and safety personnel may be informed if the condition might require emergency treatment;

— Government officials investigating compliance with laws, regulations, and instructions relevant to equal opportunity must be provided information upon request; and

— Statistics generated from information obtained may be used to manage, evaluate, and report on equal opportunity.

Accessibility and Reasonable Accommodation

General Rules:

1. No qualified individual with disabilities shall, on the basis of disability, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance.

2. All programs and activities must be accessible to, and usable by, persons with disabilities.

3. Persons with disabilities shall be provided reasonable accommodation to participate in the program or activity.

Statutes: Section 504 of the Rehabilitation Act prohibits disability discrimination in federally assisted programs. The CNCS is responsible for enforcing this provision in terms of its grantees and subgrantees. ***(For civil rights purposes, all programs, projects, and sites funded or receiving volunteers or service members under CNCS statutes are programs or activities receiving federal financial assistance.)***

The Americans with Disabilities Act (ADA) applies to virtually all CNCS grantees and subgrantees, but the CNCS does not enforce it. The ADA's nondiscrimination, accessibility, and reasonable accommodation standards for state and local governments are identical to Section 504 standards. Public places like museums, day care centers, schools, have lower accessibility and reasonable accommodation standards under the ADA (and religious institutions are exempt), but by virtue of receiving federal financial assistance, the higher Section 504 standards apply to them.

New construction and alterations (built or altered since May 30, 1979): Each building or part of a building that is constructed or altered by or for the use of any grantee or subgrantee shall be designed, constructed, or altered so as to be readily accessible to and usable by disabled persons.

Existing facilities (built before May 30, 1979): Grantees must operate each program or activity so that, when viewed in its entirety, it is readily accessible to and usable by disabled persons. For this purpose, a project plus all sites is considered. Grantees are not necessarily required to retrofit to make each existing facility accessible or to take action that would result in undue financial or administrative burdens, but the overall program must be accessible. Programmatic modifications are acceptable to achieve and maintain accessibility in buildings built before May 30, 1979.

Communications: Grantees must ensure program and employment communications are available to persons with impaired vision and hearing, and that no disabled person is denied benefits or participation because no auxiliary aids were provided for persons with impaired sensory, manual, or speaking skills.

Sexual Harassment

Definition: Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or service.

b. Submission to or rejection of such conduct by an individual is used as the basis for employment or volunteer or participation decisions affecting the individual.

c. Submission to or rejection of such conduct has the purpose or effect of unreasonably interfering with an individual's work or service performance or creating an intimidating, hostile or offensive working or service environment.

The key is that the conduct is <u>unwelcome.</u>

Examples: Sexual harassment includes, but is not limited to, the following work or service conduct:

a. Explicit or implicit demands for sexual favors in return for job or service benefits.

b. Unwelcome letters, telephone calls, or distribution or display of materials of a sexual nature.

c. Physical assaults of a sexual nature.

d. Unwelcome and deliberate touching, leaning over, cornering, or pinching.

e. Unwelcome sexually suggestive looks or gestures.

f. Unwelcome pressure for sexual favors or dates.

g. Unwelcome sexual teasing, jokes, remarks, or questions.

h. According favorable treatment to those who grant sexual favors.

Relationships vis-à-vis Sexual Harassment

Sexual harassment is not limited to prohibited conduct by a male toward a female or by a supervisor toward a subordinate. It includes prohibited conduct by a CNCS employee towards a volunteer, service member, project director, or program beneficiary, as well as such conduct by grantee employees.

— A man may be the victim of sexual harassment.

— A woman may be the harasser.

— The victim does not have to be the opposite sex from the harasser.

— The harasser does not have to be the victim's supervisor. The harasser could be:

- a supervisor who does not supervise the victim,
- a non-supervisory employee, volunteer, or service member, or
- a co-worker or another volunteer or service member.

— The victim does not have to be the person toward whom the unwelcome sexual conduct is directed, but may be someone who is affected by such conduct when it is directed toward another person.

For example, the sexual harassment of an employee, volunteer, or service member may create for another employee, volunteer or service member an intimidating, hostile, or offensive working environment.

— Sexual harassment does not depend on the victim's having suffered an economic loss as a result of the harasser's conduct.

For example, improper sexual advances which do not result in the denial of a promotion or the discharge of the victim may, nonetheless, constitute sexual harassment where they interfere with the victim's work or service, or create an intimidating, hostile or offensive work or service environment.

Harassment on sexual, racial, national origin, religious harassment, or on any other grounds is strictly prohibited in CNCS or grantee offices, other work- or service-related settings, including, but not limited to site visits or work- or service-related social events and training.

CNCS or Grantee Responsibilities Regarding Harassment

The CNCS or grantee is ultimately responsible for violations of prohibitions against any form of prohibited harassment and for taking corrective action and/or disciplinary action if violations occur. They are responsible for:

(1) **Acts of "quid pro quo" sexual harassment**, wherein a supervisor demands sexual favors for employment or service benefits, regardless of whether the CNCS or grantee, its agents or supervisory employees knew, or should have known, of the acts.

(2) **Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature which have the purpose or effect of creating an intimidating, hostile or offensive working or service environment,** where the CNCS or grantee, its agents or supervisory employees knew, or had reason to know, of acts and

failed to take immediate and appropriate corrective action.

(3) **Acts of prohibited harassment toward fellow employees, volunteers, or participants (co-workers)**, where the CNCS or grantee, its agents or its supervisory employees knew, or should have known, of the conduct, unless it took immediate and appropriate corrective action.

(4) **Acts of prohibited harassment by non-employees**, where the CNCS or grantee, its agents or its supervisory employees knew, or should have known, of the conduct and failed to take immediate and appropriate corrective action.

Discrimination Claims

Any volunteer, service member, client, employee, or beneficiary of a program or project who believes he or she has been subjected to discrimination in violation of nondiscrimination provisions of applicable laws, regulations or this policy may raise a claim with the CNCS's Office of Civil Rights and Inclusiveness (OCRI). However, discrimination claims not brought to the attention of the OCRI Office within 45 days of their occurrence of the alleged discriminatory event may not be accepted in a formal complaint of discrimination and may be procedurally dismissed.

We first attempt to resolve discrimination claims through the informal counseling process. In addition, although people are not required to do so, we encourage people to try first to resolve discrimination claims directly with programs and projects, and most service members may use their grievance system to do so. However, raising matters through a program or project grievance system does not stop the running of the 45-day time frame.

The CNCS's Office of Civil Rights and Inclusiveness

The CNCS's Office of Civil Rights and Inclusiveness (OCRI) is available to provide further information to any CNCS or grantee official, volunteer, or service member. The OCRI may be reached at (202) 606-7503, (voice), (202) 606-5256 (TDD), eo@cns.gov, or through http://www.nationalservice.gov.

Civil Rights Compliance Evaluation during Site and Monitoring Visits

The following is designed to allow evaluation of civil rights compliance during any type of on-site visit. Most items can be observed during the regular course of a visit, thereby taking no additional time or effort.

1. Is there a flat, non-gravel route from parking/street through the front entrance? Does the parking lot have spaces reserved for persons with disabilities?
2. Are doors (entrance, rest room, etc.) no heavier to open than refrigerator door? Are door knobs throughout push/pull or lever-type, not twist knobs?
3. Are halls and passageways at least one yard wide? Are they level, with non-slip, stable surfaces and no trip hazards?
4. Are there no steps without alternate routes (elevators, ramps, other entrance) available?
    a. Are stairs of uniform heights?
5. Do publicity information, brochures, handbooks, etc. state they are available in alternate formats upon request and do they identify how to request formats?
6. If eyes are closed or sound turned down during a video or PSA, do you still receive the message?
7. Is there adequate maneuvering clearance at entrances, especially rest rooms?
8. Does an accessible restroom have an accessible stall 5’ x 5’? (There are other legal configurations, but check to see if a person in a wheelchair can close the door)
9. Does an accessible restroom have a sink with level faucets, hot water pipes wrapped to prevent burns, and paper towels lowered?
10. Are emergency alarms both audible and visual? Are evacuation plans and areas of rescue assistance accessible to individuals with mobility impairments?
11. Is there a non-discrimination policy statement that applies to services provided by the site, and addresses nondiscrimination on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, and political affiliation? Have they received any claims or complaints of prohibited discrimination?
12. Are there any policies, procedures, or technology which excludes, directly or indirectly, a person with (a) mobility impairments, (b) visual impairments, (c) hearing impairments, (d) mental or emotional impairments, or (e) diseases (including HIV but excluding currently contagious diseases) or addictions (other than current illegal drug use, or current alcohol or legal drug abuse which prevents performing duties or is a direct and current threat to self or others)?

Guidance on Closing-Out Your CNCS Grant

From the Field Financial Management Center (FFMC)

In order to close-out a CNCS Grant, CNCS requires the following four items. 1. A final FFR (Federal Financial Report) with CNCS, 2. Cash Transaction Report with PMS (Payment Management System), 3. Inventory Report (if required), 4. Final PPR with CNCS. These documents should be completed and returned to CNCS no later than 90 days after the grant expiration date.

1. A final Federal Financial Report (FFR) in the CNCS electronic grants system. This must show that the required match was met (and Direct Benefit Ratio for Stipend Programs was met) and the Total Federal Share of expenditures must match the total drawdowns from PMS. If the final PMS drawdown has not been completed, please wait to file the CNCS FFR, until the final amount has been confirmed. If there are leftover CNCS funds, these should be indicated on the FFR (unobligated balance of federal funds) and will be de-obligated during the close-out process. Please note there cannot be any "un-liquidated obligations" listed on a final FFR. Please contact your CNCS Grants Officer if you have questions about this report.

2. A Federal Cash Transaction Report must be submitted in the Payment Management System (PMS). This can only be done during the open periods for filing (January, April, July, and October). Please ensure the final drawdown of CNCS funds from PMS is completed as soon as possible.

a. Example: Your grant ends 4/30, the final drawdown in PMS should be done before June 30th, so it can be accounted for during the July open reporting period that covers April, May and June. If the final drawdown is not completed until July, those funds cannot be reported until October. This will make the close-out late and could result in a hold being placed on your current grant funds.

   In order to close-out the grant, the amount drawn from PMS must match the amount disbursed (on the cash transaction report) in PMS, to the penny. If $365,002.65 was drawn down, then $365,002.65 must be disbursed and $365,002.65 must be the Total Federal Share of Expenditures reported on the CNCS FFR. For assistance with PMS, please contact the help desk at 1-877-614-5533 or PMSSupport@psc.gov .

3. In the event that you have more than $5,000 in supplies left over from the grant, you must notify your grants officer.

4. A final Program Progress Report (PPR) must also be submitted, please contact your CNCS Program Officer if you have questions about this report.

Appendix 17: Progress Report Tips

SENIOR CORPS PROGRESS REPORT (PPR) Tips

This document is provided as a guide for Senior Corps grantees. ***It is not intended to replace the Progress Report Instructions*** *that are posted on the* ***Managing Senior Corps Grants*** *webpage.*

Some information you share in your reports may fit in more than one narrative. Select where you think it fits best. It is not necessary to repeat information in more than one section.

Challenges	**Enter any challenges you or your volunteers experienced in the reporting period and how they were addressed. Let your program officer know if you need assistance. Describe any new challenges affecting your project during the reporting period.** **You might consider highlighting:** • Work Plans/Performance Measurement Challenges/Issues • Station Development • Volunteer Recruitment/volunteer hours ***Do not wait for the progress report if you need support from your program officer.***
Partnership/ Collaboration Development	**Partnerships and community collaborations are a big part of your project. Share news about partnerships developed and how the partnership will result in better serving your beneficiaries, or otherwise reaching project goals. Describe efforts to develop partnerships or collaborations with volunteer stations. Include efforts to develop new stations as well as efforts to garner support (data collection, volunteer training, etc.) from existing stations.** **You might consider also highlighting things like:** • Partnerships with other CNCS programs or national service members. • Collaboration connected to National Days of Service or local service activities/events. • Collaboration with local philanthropic organizations, business leaders, other non-profits. Highlight roles, responsibilities and outcomes of partnership.
Non-Federal Share Development	**Describe efforts to meet the non-federal share requirement for your project. Include both cash and in-kind resource development that occurred during this reporting period.** •If you have received notice of funding awards, please describe the dollar value, name of funder, and *purpose of the funding.* • Submit the award letter as an attachment.
Other Accomplishments	**Use this section to report on accomplishments other than those already reported in the Project Plan or previous narratives. Describe any significant project accomplishments other than your work plan progress that you will report in this PPR.** **You might consider also highlighting things like:** • Impact data that is not reported in the performance measurement work plan. • Policies, systems or status updates pertaining to Senior Corps regulations: o RSVP Annual Safety Check Status o (FGP/SCP/RSVP) Accessibility Evaluation/Survey Results

- o Update to Senior Corps program policies or procedures (ex. mileage rates, leave policy, handbooks)
- o Annual volunteer recognition activity
- o Advisory Board/Community Assessments
- Events or activities in which **public officials** participate.
- Social media outreach
- Recruitment successes

Impact Stories **Share stories that are not reported in the project plan and other data. Brief stories that communicate to the public how your program or volunteers "get things done" in your community are best, particularly those that include impact or results.**

- It is helpful if Impact Stories are built using the following template:
- o Suggested length for stories: 75-200 words
- o Volunteer's Name
- o Name of Sponsor, location (City/State) of project
- o Brief statement of accomplishment
- o Include statistics, numbers, etc. that demonstrate impact
- CNCS State Offices encourage project directors to submit impact stories directly to them between progress reports. CNCS program officers share you grantee stories on the monthly cluster report. The same stories can be included in this PPR report.

List of Additional Documents submitted to CNCS

Documents cannot be attached in the electronic grants management system so it is helpful if you include links to items or a list of items mailed or emailed to your program officer in this section.

Suggested additional documents could include:

- Evidence of community input (advisory council agenda's, community meeting agenda, etc.)
- Updated or adjusted project forms (timesheets, MOU, Volunteer Mileage Forms, etc.)
- PR
- o Local media
- o News articles
- o Feature in the agency or project newsletter
- Volunteer Recognition
- o Thank You letters
- o Recognition speeches/comments from Public Officials
- Demonstration of Impact

Appendix 17: Progress Report Tips

Checklist for Completing Progress Reports

General tips

- ☐ Keep good records during the year
- ☐ Schedule plenty of time to write reports
- ☐ Organize all documents needed for the report before getting started
- ☐ Do not leave anything blank ("NA" stands for "not acceptable")

Some best practices for reporting in the Performance Measure section:

- ☐ Remember that clear, concise work plans in the grant application is the key to good, simple reporting
- ☐ Keep reporting aligned with original work plans
- ☐ If you have not fully reached a project milestone, report on the progress to date
- ☐ Include statistics in reports, not just descriptions
- ☐ Include real numbers with percentages. For example, say "75% of respondents (45 out of 60)" instead of only "75% of respondents"

Some best practices for reporting in the Narrative section:

- ☐ **Challenges:** What are you doing to address challenges? Do not wait for the progress report if you need support from your program officer.
- ☐ **Training/technical assistance needs:** What are the training and technical assistance needs of your project?
- ☐ **Partnership/Collaboration development:** In addition to listing new partnerships, describe how activities with partners relate to achieving project goals
- ☐ **Non-federal share development:** If the resource leveraged is an in-kind donation, has it been documented in compliance with federal regulation?
- ☐ **Other accomplishments:** Provide specific information
    - Example- Training Events: Describe how many participants were involved, what the training covered, and who conducted the training.
- ☐ Do not wait until progress report is due to notify the CNCS State Office of major accomplishments

QUICK REFERENCE CHART FOR SENIOR CORPS REPORTS AND DUE DATES

The Notice of Grant Award (NGA) is the project sponsors' official notification of reporting requirements, due dates, and any special conditions (requirements) of the grant. **Check your NGA, including the Terms and Conditions to verify your due dates and any special conditions.**

Report	Due Date	Where to Submit
SF424- Grant Application (New, Renewal or Continuation)	Due date is given in Senior Corps Notice of Funding Available for renewals or competitions, and in the Grant Continuation letter from your CNCS Program Officer. Generally due about 9-10 weeks before your grant end date.	• Electronic grants management system • Required Documents- submit as directed to CNCS State Office and/or
Progress Report	Grantees must prepare the ***Progress Report-Annual*** at the end of the budget period. Grantees will complete the ***Progress Report Semi-Annual- Lite*** half way through the budget year. Reports must be submitted in the electronic grants management system no later than 30 days after the end of the designated reporting period.	• Electronic grants management system
Progress Report Supplement (PRS):	Due date is announced in the Annual Senior Corps Guidance. It is usually in Oct.-Dec. Historically, the Reporting Period has been July 1 – June 30 for all Senior Corps grants. This report is also referred to as the PPVA in some materials.	• Electronic grants management system
Annual Project Assessment	The annual assessment is determined by project sponsor. For more information see the Senior Corps Grant Application Instructions.	Submit assessment report to State Office with continuation grant during year 2 or year 3.
FFR: *Federal Financial Report to CNCS*	30 days after the first, and each consecutive 6-month reporting period based on your grant period. See below for Final FFR. Data is cumulative for the 3 year grant period.	• Electronic grants management system
FFR - Final	90 after the end of year 3 of the grant performance period	• Electronic grants management system
(HHS PMS) **FFR** – Cash Transactions Report SF 272	For disbursement activity during the months of: / The FFR is due on: January 01 through March 31 - 2nd Qtr. / April 30 April 01 through June 30 - 3rd Qtr. / July 30 July 01 through September 30 - 4th Qtr. / October 30 October 01 through December 31 - 1st Qtr. / January 30	HHS/PMS
Re-Budget: *Revision of budget, changes requiring approval.*	If necessary, no later than 30 days before the end of the budget period. Discuss budget revisions with your State Office prior to initiating an amendment in the electronic grants management system.	• Electronic grants management system

Federal Fiscal Year - October 1 – September 30

Reporting Periods			
Federal Quarter	***Start***	***End***	***Due Date***
Quarter 1	October 1	December 31	January 30
Quarter 2	January 1	March 31	April 30
Quarter 3	April 1	June 30	July 30
Quarter 4	July 1	September 30	October 30

Volunteer Tracking Software Distributors

Following is a list of software programs that are designed to track volunteer demographic and service information. This information is provided for the convenience of grantees, and **Senior Corp does not endorse these or any other vendors**. Please bring any other vendors to the attention of Senior Corps so they can be added to future lists. (Email: SeniorCorpsHandbook@cns.gov)

Leaping Ware (formally VolTrax): www.leapingware.com/index.html

OnCorps Reports: www.oncorpsreports.com

Volunteer Hub: www.volunteerhub.com/

Volunteer Reporter: www.volsoft.com/product/volunteer-reporter/

Volgistics: www.volgistics.com/

Volunteer Spot: www.volunteerspot.com/

For a list of Volunteer Software with Reviews:
www.coyotecommunications.com/tech/volmanage.html

Appendix 20: Acronyms Related to CNCS

425 ..... SF-425 Federal Financial Report (FFR)
424..... SF-424 Application for Fed Assistance (Grant Application)
AC ..... AmeriCorps
BPMR ..... Budget, Performance, and Management Reporting
CB ..... Community-Based
CCR ..... Central Contractor Registration
COB ..... Close of Business
CFDA ..... Catalog of Federal Domestic Assistance
CFR..... Code of Federal Regulation
eCFR.....Electronic Code of Federal Regulation
CHC ..... Criminal History Check
CNS/CNCS ..... Corporation for National and Community Service
DBR..... Direct Benefit Ratio
DUNS..... Data Universal Numbering System (Dun & Bradstreet)
EIN ..... Employer Identification Number
FFATA ..... Federal Funding Accountability and Transparency Act
FFMC ..... Field Financial Management Center (CNCS)
FFR ..... Federal Financial Report
FGP ..... Foster Grandparents Program
FICA ..... Federal Insurance Contributions Act
FSRS ..... FFATA Sub-award Reporting System
FTE ..... Full-time Equivalent
FMS ..... Financial Management System
GARP ..... Grant Application Review Process
GED ..... General Equivalency Diploma
GME ..... Grant-Making Entity
GO ..... Grants Officer
HHS ..... U.S. Department of Health and Human Services
IDCR ..... Federally Approved Indirect Cost Rate
IPERA..... Improper Payments Elimination and Recovery Act
IPERIA..... Improper Payments Elimination & Recovery Improvement Act
K-12..... Kindergarten through 12th Grade
LEA..... Local Education Agency
LSA ..... Learn and Serve America
MSY ..... Member Service Year
MTDC..... Modified Total Direct Costs
NCBP..... Nonprofit Capacity Building Program
NCCC ..... National Civilian Community Corps
NGA ..... Notice of Grant Award
NOFA ..... Notice of Funds Availability
NOFO ..... Notice of Funds Opportunity
NSCHC..... National Service Criminal History Check
NSSC..... National Senior Service Corps
OIG..... Office of the Inspector General
OMB ..... Office of Management and Budget
OGM ..... Office of Grants Management (CNCS)
PDAT ..... Program Development and Training
PER ..... Periodic Expense Report
PFI ..... Programming for Impact
PMS ..... Payment Management System
PO ..... Program Officer
PNS ..... Programs of National Significance
PPR ..... Program/Project Progress Report
PRS.....Progress Report Supplement
PPVA ..... Project Profile and Volunteer Activity
PSSA ..... President's Student Service Award
RFP ..... Request for Proposals
RGA ..... Request for Grant Applications
RSVP ..... Retired and Senior Volunteer Program
SAA ..... Edward M. Kennedy Serve America Act of 2009
SC ..... Senior Corps
SCP ..... Senior Companion Program
SIF ..... Social Innovation Fund
SUTA ..... State Unemployment Tax Act
T/TA ..... Training and Technical Assistance
VGF ..... Volunteer Generation Fund
VISTA ..... Volunteers in Service to America
VSY ..... Volunteer Service Year
VBR..... Volunteer Benefit Ratio