

Member and Site Monitoring and Reporting Requirements

Webinar Session Highlights (August 23, 2018)



AmeriCorps grantees are required to conduct member and site monitoring and reporting to ensure compliance with applicable federal requirements and achievement of performance goals. CNCS developed this webinar to support grantees in building and enhancing these practices. The session provided an overview of general requirements and expectations related to site and member monitoring; highlighted tools and best practices; and delved into monitoring and reporting processes in practice via a discussion with two AmeriCorps grantees.

Speakers

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Overview

AmeriCorps grantees must conduct monitoring on each program, function, or activity that is supported by their grant or subgrant. As processes that are both essential to accurate grant reporting and critical elements of continuous program improvement, monitoring and reporting should be integrated into all aspects of program management. CNCS has outlined three principles associated with monitoring and reporting practices to facilitate compliance:

1. **Prevent** compliance issues from happening by setting up strong systems for training and oversight.
2. **Detect** any compliance issues as soon as they occur through robust monitoring strategies.
3. **Enforce** corrective actions to ensure that the compliance issues are resolved promptly and preventative measures are put in place for the future.

Grantees must develop a **monitoring plan** early in the program implementation stage that addresses the following:

- **Who?** Both the programmatic and the financial sides of the organization should conduct monitoring together as a unified team, communicating openly about what they are seeing and what it means.
- **What?** All aspects of AmeriCorps funded activities should be monitored.
- **When?** Monitoring activities should be built into the program and financial staff schedules up front and should follow the flow of the program year.
- **Where?** Monitoring may be conducted onsite, virtually, or both.
- **How?** The specific monitoring methods used will depend on the geography, program design, and type of risk posed by the program and structure.

Risk-Based Assessments

Risk-based assessments are at the heart of what CNCS refers to as the “pyramid of monitoring” and serve as a comprehensive and consistent approach to monitoring. Assessments diagnose potential challenges before they arise, create supportive structures to maximize the ability for every site and member to be successful, and facilitate smart allocation of staff time and resources.

While assessments should be conducted before the start of a program year so as to design one’s monitoring plan using up-to-date information, they are not a one and done exercise. As conditions change and/or program models evolve, grantees must continually assess the impact of changes and monitoring approaches to mitigate challenges.

Monitoring Methods

Central to all monitoring plans, the results from a risk-based assessment should inform your choice of monitoring methods (e.g., site visits, desk audits, ongoing communications). Consider the following factors when selecting monitoring methods. First, assess the degree and type(s) of risk posed by a subgrantee/site as this will help decide where

to focus monitoring efforts and which methods to utilize. Then, determine the area(s) of focus for monitoring and most appropriate method. Next, incorporate budget and staff capacity realities into your determination as these will help prioritize where to utilize limited resources. Finally, consider the timing of monitoring activities, scheduling time- and labor-intensive monitoring for less busy periods and visits to new sites and subgrantees as early as possible.

Site Visit Best Practices

- Ask open-ended questions.
- Observe member service in action.
- Gather and cross-check information from personnel in multiple roles (e.g., members, site supervisors).
- Review key documents prior to visit (e.g., site agreement, member position descriptions).
- Consider unannounced visits when necessary and appropriate for the program design and service activities.

Desk Audit Best Practices

- Ensure in-depth reviews of member documentation – and not just presence of something but also content.
- Review criminal history check documentation for members and staff.
- Confirm appropriate tracking/verification of staff and member time.
- Review financial transactions and match documentation in conjunction with budget data.
- Aim for representative samples (e.g., include members of different service terms, those who have exited).
- Use secure file transfer systems to receive files with sensitive personal information.

Ongoing Communication Best Practices

- Organize regularly scheduled check-ins (phone, in-person).
- Engage in regular email correspondence.
- Review progress and financial reports for red flags, inconsistencies, and challenges that need to be addressed.
- Examine reimbursement requests.
- Review member training and reflection activities to identify concerns.

Common Risks

During the monitoring process (and throughout the year), stay attuned to the following:

- Member service issues, particularly those that involve prohibited or unallowable activities;
- Site staff turnover/poor member retention;
- Excessive absences from training and/or required activities;
- Low quality and/or late reporting;
- Output/outcome data that deviates substantially from expected targets;
- Unusually high or low expenditures; and
- Difficulties with meeting required match levels.

Steps to Respond to a Compliance Issue

In the event that you identify a compliance issue, there are six important steps that you should take:

1. Document the issue, regardless of the size of the problem.
2. Specify required corrective actions in writing.
3. Notify CNCS if appropriate. (Reporting requirements are outlined in the terms and conditions; when in doubt, discuss with your Program Officer.)
4. Re-train staff and/or members, as appropriate.
5. Follow up within a reasonable period to confirm that the issue has been corrected.
6. Disallow hours and/or costs if needed.

For More Information

- [Managing AmeriCorps Grants](#)
- [National Service Knowledge Network eCourses](#)
- [Financial Management Resources](#)