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# Member Records, Files, and Documentation AmeriCorps

Corporation for  
NATIONAL &  
COMMUNITY  
SERVICE 



Financial and Grants Management Institute  
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# You need to know . . .

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The information in this session is based on CNCS and Federal laws, rules, and regulations; CNCS grant terms and provisions; and generally accepted accounting and financial principles and practices.

Some state commissions, national grantees, or parent organizations may impose additional requirements.



# Welcome . . .

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- Introduction of trainer and CNCS staff
- Program types represented
  - Senior Corps, AmeriCorps, SIF, NCB, 9/11, MLK
- Questions
  - As we go . . . ask clarifying questions and provide your experiences
  - Questions at the end as time permits



# Session Objectives

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1. Review of programmatic requirements relating to AmeriCorps members including required records and files
2. Discuss the significance of these records for determining allowable costs

# Member Records

See Handout 1

## □ Verification

- The grantee must obtain and maintain documentation as required to support all program requirements
  - For example, programs need to support AmeriCorps member eligibility with documentation

## □ Recordkeeping

- The grantee must ensure that records are maintained sufficient to establish that each member was eligible to participate and that the member successfully completed all requirements
- A program may store member files electronically if the program can ensure that the validity and integrity of the record is not compromised



# Electronic Storage of Records - AmeriCorps Member Records

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## The electronic storage procedures and system must

- Provide for the safe-keeping and security of the records, including:
  - Sufficient prevention of unauthorized alterations or erasures of records
  - Effective security measures to ensure only authorized persons have access to records
  - Adequate measures designed to prevent physical damage to records
  - A system providing for back-up and recovery of records
- Provide for the easy retrieval of records in a timely fashion, including:
  - Storage of the records in a physically accessible location
  - Clear and accurate labeling of all records
  - Storage of the records in a usable, readable format
- Where there is a requirement for a signature on a record, electronically stored records must include an image of the original signature
  - Records without signatures, when required, are considered incomplete



# Member Information & Confidentiality

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## □ Confidentiality

- The grantee must maintain the confidentiality of information regarding individual members
- The grantee must obtain the prior written consent of all members before using their names, photographs and other identifying information for publicity, promotional or other purposes



# Member Eligibility - §2522.200

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An AmeriCorps member must –

- Be a lawful citizen, national or permanent resident alien of the United States
- Be at least 17 years of age
  - “Out-of-school” youth at age 16 can participate in youth corps
- Have a high school diploma or its equivalent
  - Or have not dropped out to enroll as an AmeriCorps member and must agree to obtain a high school diploma or equivalent
    - Tutors must have a HS diploma



# Member Eligibility Documentation

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- CNCS does not require programs to make and retain copies of the actual documents used to confirm eligibility
  - As long as program has a consistent practice of identifying the documents that were reviewed and maintaining a record of the review
- A consistent practice for documenting eligibility should:
  - Identify the specific original document reviewed
  - Identify the eligibility criterion or criteria that the document confirms
  - Include any identification number for the document reviewed, and
  - Include the signature of the reviewer confirming the review and the date of the review
- Birth certificates, driver's licenses, and passports are examples of documents that confirm a member is old enough to serve



# Member Eligibility - §2522.200

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- As of February 27th, 2012, when an individual accepts a national service position in *My AmeriCorps* or is enrolled in a national service position by the organization in eGrants
  - the individual's information will automatically be sent to and reviewed by the Social Security Administration
  - Receive reply within 3 business days



# Member Eligibility - §2522.200

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- If the individual's information is verified, your organization will not need to do anything
- The individual's status will appear as "Verified" in their *My AmeriCorps* account and in eGrants for your records



# Member Eligibility - §2522.200

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## □ Not Verified

- In the unusual instance that the individual's information cannot be automatically verified, your organization will receive an email regarding next steps that will include a request for documentation

**See Handout 2**



# Member Eligibility - §2522.200

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- AmeriCorps State and National organizations
  - Need to review and verify the individual's documentation and provide it to CNCS via the National Service Hotline within 30 days of the request for documentation
- AmeriCorps VISTA sponsors
  - A hold up in this verification process may prevent the individual from serving with your organization



# Acceptable Eligibility Documentation

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For a U.S. Citizen or National, any one of the following is acceptable:

- ❑ **Birth certificate** showing that the individual was born in the one of the 50 states, the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, American Samoa, or the Northern Mariana Islands
- ❑ **Valid U.S. Passport** issued to the individual as a U.S. citizen
- ❑ **Report of Birth Abroad of a Citizen of the USA** (FS-240) issued by the U.S. Department of State
- ❑ **Certification of Birth Abroad** (FS-545) issued by the U.S. Department of State
- ❑ **Certificate of U.S. Naturalization** (Form N-550 or N-570) issued by the U.S. Citizenship and Immigration Services (USCIS, formerly Immigration and Naturalization Service)
- ❑ **Certificate of U.S. Citizenship** (Form N-560 or N-561) issued by the USCIS



# Acceptable Eligibility Documentation

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For a lawful permanent resident of the U.S., any one of the following is acceptable:

- **Permanent Resident Card** (Form I-551)
- **Alien Registration Card receipt** (Form I-551)
- A **passport** indicating that USCIS has approved it as temporary evidence of lawful admission for permanent residence

# Member Agreement – 2011 AmeriCorps Provisions Supervision and Support Section D

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## Necessary Basics

- ❑ The member Position Description
- ❑ The minimum number of service hours and other requirements necessary to successfully complete the term of service and to be eligible for the Education Award
- ❑ Standards of conduct, as developed by the grantee or subgrantee
- ❑ Prohibited activities, including those specified in the regulations
- ❑ Requirements under the Drug-Free Workplace Act
- ❑ Suspension and termination rules
- ❑ The specific circumstances under which a member may be released for cause
- ❑ Grievance procedures
- ❑ Other requirements as established by the grantee

**See Handout 3**

# Member Background Checks – §2522.205

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- Criminal History checks must be performed for all members enrolled on or after 10/1/2009
- You must apply suitable criteria relating to criminal history to a member and STAFF who receives a CNCS grant-funded living allowance, stipend, education award or salary (even if their salary comes from match)
- Individuals who are required to be registered on a State sex offender registry are deemed unsuitable and may not serve

**For more information: CHC 101 and 102 sessions**



# Member On Board

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- ❑ Collect and retain eligibility information, as needed
- ❑ Review and sign member service agreement prior to accumulating service hours
- ❑ Conduct and document member orientation and review expectations, requirements and provide training



# Member Timesheets

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See Handout 4

- Member timesheets are a record of service and training hours
- They are documentation necessary to support eligibility for the education award and must support the number of hours for the type of award
- Must be: totaled correctly, marked with permanent ink and **SIGNED** and dated by **BOTH** member and supervisor



# Member Timesheets

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- Member timesheets should document service, training, and fundraising
- Training time cannot exceed 20% of the aggregate hours for all program members
- Fundraising is limited to 10% of the individual member hours



# Member living allowance disbursement - §2522.245

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- A living allowance is not a wage and programs may not pay living allowances on an hourly basis
- Programs must distribute the living allowance at regular intervals and in regular increments, and may increase living allowance payments only on the basis of increased living expenses
- Living allowance payments may only be made to a member during the member's term of service
- Living allowance payments must cease when the member concludes the term of service



# Member living allowance disbursement - §2522.245

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- Programs may not provide a lump sum payment to a member who completes the originally agreed-upon term of service in a shorter period of time
- Member stipend should not continue to be paid if there is evidence member has discontinued their service



# Living Allowance Taxes & Insurance – AmeriCorps Grant Provisions

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- **FICA** (Social Security and Medicare taxes): Grantee must pay FICA for any member receiving a living allowance; the grantee also must withhold 7.65% from the member's living allowance
- **Income Taxes:** Grantee must withhold Federal personal income taxes from member living allowances, requiring each member to complete a W-4 form at the beginning of the term of service and providing a W-2 form at the close of the tax year; the grantee must comply with applicable state and local tax requirements
- **Worker's Compensation:** Some states require worker's compensation for AmeriCorps members; if worker's compensation is not required, grantees must obtain Occupational, Accidental, and Death and Dismemberment coverage for members to cover in-service injury or incidents



## Member Release from Service - §2522.230

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- An AmeriCorps member may be released from service for a personal compelling circumstance or for cause
  - Compelling personal circumstance criteria are issues beyond the member's control, including: disability, serious illness, death of family member, military service obligations
    - Members that are exited for these reasons receive a pro-rated education award
  - Member released for cause do not receive an education award
- Member file must be documented with evidence of Compelling Personal Circumstance



# Significance

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- ❑ Member files are reviewed as part of a grant monitoring and should be complete at all times
- ❑ During OIG audits any member eligibility that is questioned could result in the subgrantee having to repay the funds paid to that member for living allowance, taxes, and insurance
- ❑ And Member is not eligible for education award



# Significance (cont'd)

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- The member's education awards may become questioned and disallowed if:
  - Eligibility is not documented correctly
  - Timesheets are added incorrectly, not signed or contain unallowable activities, such as excessive fundraising or training hours
  - Partial awards for compelling personal circumstances have not been documented in the member file



# Frequent Issues

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- ❑ Eligibility for service is missing: citizenship, education attainment, age verification
- ❑ Criminal history checks not completed or improperly documented
- ❑ Missing, incomplete, or improper timesheets
- ❑ Timesheets not signed and dated by member and supervisor
- ❑ Improper living allowances – excessive payments, paid on an hourly basis, paid after exiting
- ❑ Failure to pay at current rate (below the minimum for full-time or above the maximum for any term type)
- ❑ Misapplication of FICA
- ❑ Service hours – unsupported, insufficient, before or after award member agreement was signed or after completion of term of service
- ❑ Incomplete or missing records, documentation, or forms
- ❑ Exceeded 20% of total hours spent on training and education activities – AmeriCorps only



# Where to go for information

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- Review your Grant Provisions, there is a link in every Notice of Grant Award
- Review Code of Federal Regulations to be sure that member Eligibility documentation is appropriate
- Contact the National Service Hotline @ 800-942-2677 or [www.nationalservice.gov/questions](http://www.nationalservice.gov/questions)
- National Service Resource Center has sample checklists for member file review
- If you have any questions contact: CNCS Program Officer, State Commission, or National Program Parent



# Grant Provisions

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- These are found in the form of a web link in every Notice of Grant Award:
  - The Notice of Grant Award is in eGrants, just log into your account
  - The Provisions are found under the heading “Terms of Acceptance” in the form of a Web link
    - Click on the link and it takes you to specific provisions written for your award (you may have to press the CTRL button on your keyboard simultaneously clicking the link with your ‘mouse’)
  - Contact your Grants Officer if you cannot locate them

# Taking it Home!

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- Be sure that you are clear on member eligibility requirements
- Establish and implement internal controls to verify information is accurate and complete
  - Include a review prior to exiting members
- Be sure to ask if your understanding of member requirements is not clear



# Questions?

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Open

Wrap Up

Evaluation

# For More Information

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- **Contact your CNCS Grants Officer**

- E-mail or call your Grants Officer

- **Contact MBI Consulting**

- Financial & Grants Management Training and Technical Assistance Provider

- Telephone: 301-986-1595, ext. 110

- E-mail: [cforrester@mbicfs.com](mailto:cforrester@mbicfs.com)

- **Visit the Resource Center**

- Online tools and training

- [www.nationalserviceresources.org/financial-and-grants-management](http://www.nationalserviceresources.org/financial-and-grants-management)

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