

**VISTA GUIDE FOR
QUALITY ASSURANCE AND
COMPLIANCE MONITORING SITE VISITS**

August 2013

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I. OVERVIEW: ABOUT QUALITY ASSURANCE AND COMPLIANCE MONITORING SITE VISITS

1. CNCS Policy AOM-2006-02-2011-3 (<http://portal.cns.gov/CNCSDepartments/-OfficeofAwardOversightMonitoringAOM/MonitoringPolicies.aspx>) establishes a broad range of activities in support of CNCS's oversight and monitoring program, including on-site and office-based activities across the range of CNCS's national service programs. The purpose of this Guide is to describe the purpose and procedures specifically for conducting on-site compliance visits to monitor VISTA projects and provide a detailed protocol to be completed as part of the process.
2. Annually, prior to the beginning of each Federal fiscal year, all active CNCS awards are assessed for potential vulnerabilities, following the procedures in the "Process Guide: Corporation-Wide Monitoring Planning and Assessments." An on-site monitoring visit (either compliance or training/technical assistance-T/TA) must be planned for awards with a "high" priority level designation as determined through the assessment process. On behalf of the VISTA program, the Program Officer, and in cases of Program or Support Grant VISTA projects, the Grants Officer, make a determination whether the visit should be compliance-based or T/TA-focused, or a combination of the two, taking into account such factors as whether the sponsor is new, the date of the last compliance visit, and the sponsor's need for specific T/TA.
3. Regardless of the priority level assigned as a result of the annual assessment process, an on-site compliance monitoring visit must be conducted at least once every six (6) years from the date of the previous compliance monitoring visit. Oftentimes however, it may be appropriate to conduct on-site monitoring visits more frequently, particularly when we learn of potential or actual issues at a project that warrant attention.
4. When conducting an on-site compliance visit for a multi-site/intermediary project, visit the primary sponsor and, when possible, a sampling of sub-recipient sites. The primary sponsor is responsible for compliance of sub recipient sites. Consider the following criteria to determine which sub recipient sites to visit:
 - Whether the site has a high percentage of the project's VISTA members.
 - Location (e.g., rural, urban, proximity to primary sponsor, etc.) and organization size.
 - Whether previously submitted AmeriCorps VISTA Project Progress Reports (PPR) or other reports have indicated that a site is having difficulty achieving its target accomplishments.
 - Whether the State Office have received credible complaints from VISTAs or Leaders.

Consider conducting a telephone interview with sub recipient sites that are not visited.

5. The Purposes of the Quality Assurance and Compliance Monitoring Site Visit are to:
 - Test compliance with VISTA statutory, regulatory, and policy requirements,
 - Identify and minimize potential risks to CNCS;
 - Identify specific technical assistance needs;
 - Document effective practices;
 - Recognize accomplishments;
 - Improve quality of programming;
 - Determine effectiveness of performance measurement
 - Provide guidance; and
 - Analyze recurring problems.
6. The legislation under which the VISTA program operates is the Domestic Volunteer Service Act of 1973 (DVSA), which is available on the CNCS public website at: http://www.nationalservice.gov/sites/default/files/documents/1973_domesticvolunteer_service_act_amendedthrougphl111_13.pdf.

CNCS has authority to develop and implement the VISTA program through regulations, which are codified in the Code of Federal Regulations (CFR), and policy. Regulations have legal weight and implement the DVSA.

Policies also have legal weight but lesser weight than regulations. Current regulations that pertain to VISTA are found at 45 CFR Parts 1206, 1210, 1211, 1216, 1217, 1218, 1219, 1220, 1222, and 1225, and can be accessed on the CNCS public website at: http://www.nationalservice.gov/pdf/45CFR_chapterXII.pdf.

VISTA program policies, and grant award terms and conditions for VISTA sponsoring organizations clarify or update details of the VISTA program not defined elsewhere in statute or regulation. Policies, and award terms and conditions may be found, as appropriate, in the Notice of Grant Award, Certifications and Assurances, Memorandum of Agreement, Member Handbook, and Supervisor Manual.

7. If possible, the site visit begins with a courtesy meeting with the sponsor's Executive Director (ED) or Chief Executive Officer (CEO) or designee to: 1) explain the purpose of the compliance review, and 2) inquire concerning any sponsor concerns and issues to be included in the review. The site visit is to conclude with an exit interview informing the ED/CEO or designee of the preliminary findings.
8. The site visit also should include interviews with:
 - the Project Director;
 - Site supervisor(s), if different from the Project Director;
 - VISTAs and Leaders;
 - Members of the Board of Directors or Project Advisory Group, as appropriate

Section VII of this Guide includes sample interview questions. You may wish to use these interview questions to gather information before beginning the site visit protocol.

9. The site visit protocol in this Guide contains four components.

THE FOLLOWING COMPONENTS ARE COMPLIANCE ISSUES:

- A. Program Requirements
- B. Fiscal Requirements - For Program and Support Grants Only

THE FOLLOWING COMPONENTS ARE RECOMMENDED PRACTICES AND OTHER CONSIDERATIONS:

- C. Programming , Community Participation, Sponsor Operations, Sustainability
- D. VISTA Recruitment, Assignment, Support

10. This protocol contains pertinent questions related to the site visit. Questions that refer to specific statutory provisions of the DVSA, VISTA regulations, OMB Circulars, Memorandum of Agreement terms and conditions, or other documents are in Sections A-B and raise possible compliance issues that could result in a finding. Appropriate references have been cited for these questions. Questions in Sections C-D are without citations and are based on prudent management practices and other non-compliance considerations. Use this protocol to record the findings, issues, and follow up related to the site visit. Each section contains primarily “Yes” or “No” questions, with space provided to describe any issues or record findings more thoroughly. **This Guide is not intended as a questionnaire to be completed by sponsor staff; rather, responses should always be completed by the CNCS staff person(s) who conducts the visit based on information they collect and review.**

Additional instructions are provided, if necessary, at the start of each section.

11. You must document on-site compliance visits and follow-up compliance visits in the eGrants Monitoring Module. [CNCS Policy AOM-2006-001](http://portal.cns.gov/Portals/0/2012%20Policies/Monitoring%20Plan%20Activity%20Documentation.pdf) (<http://portal.cns.gov/Portals/0/2012%20Policies/Monitoring%20Plan%20Activity%20Documentation.pdf>) contains the requirements for documenting monitoring activities in the eGrants Monitoring Module, and the eGrants Staff Manual explains how to use eGrants to review and document reports reviews and when to use the document attachment functionality to attach documents to the relevant monitoring entry.

II. PRE-SITE AND POST-SITE VISIT CHECKLISTS AND QUESTIONS

PRE-SITE VISIT CHECKLIST

1. 30 calendar days prior to site visit:

Generate Notification Letter in eGrants, or use the document attachment functionality in eGrants to upload a Word or PDF version of the letter on the Monitoring Module Activities screen for the current monitoring event entry. Send the letter with a copy of the Monitoring Guide to the sponsor's CEO/ED with copies to the Project Director (and site supervisor, if applicable) and member of the community participation group (i.e., Board of Director's/Project Advisory Group, as appropriate).

2. Review project documents in official files (hard copy and electronic) and note issues of concern from:

- a) Previously submitted Project Progress Reports (PPRs).
- b) Previously submitted fiscal reports (Field Financial Report), if applicable.
- c) Prior monitoring visits.
- d) Audit reports.
- e) Memorandum of Agreement.
- f) For Program or Support Grant projects, the Notice of Grant Award: (1) Standard Conditions and (2) Special Conditions.
- g) Project application in eGrants.
- h) Project plan with performance measures -- Print out and take copies.
- i) VISTA Assignment Description (VAD) -- Print out and take copies.
- j) On-site orientation and training plan (OSOT).
- k) My AmeriCorps recruitment listing.
- l) Sponsor verification forms.
- m) Cost share invoices, if applicable.
- n) Annual assessment results.
- o) For Program Grant projects, records of the End of Service benefit elections of VISTAs on the project (from My AmeriCorps portal)
- p) Areas of inquiry/interest established by the State, Cluster, or National Office.

3. Review the VISTA Campus and the Resource Center for a refresher of terms and conditions and effective practices, if needed.

4. For Support and Program Grant projects, consult with Grants Officer concerning any issues related to financial reporting/management or A-133 or other audit report or financial findings that can be looked into during the visit. List these issues below (e.g. questionable costs, internal controls, bankruptcy, defunding by other agencies, etc.):

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POST-SITE VISIT CHECKLIST*

1. Record the date of compliance monitoring site visit in eGrants **within 5 work days of returning to**

* Refer to the latest version of CNCS Policy AOM 2006-001 for full details and instructions.

the office.
2. Review your notes and Section Summaries in the completed Compliance Monitoring Guide for preparing the required follow up/actions required or final/completed letter to the sponsoring organization.
If follow up actions by the sponsor are required, complete the actions in Items 3 through 8 plus Item 10, below. If <u>no</u> follow up actions by the sponsor are required, complete only Items 9 and 10.
3. (a) Report fiscal findings and proposed corrective actions and/or follow-up financial monitoring recommendations, if any, to the Grants Officer(GO) and (b) Agree with GO on corrective actions, if any, to be included in the follow-up letter.
4. Generate Follow Up/Actions Required Letter and send within 30 calendar days after the site visit to the ED/CEO of the sponsoring organization with copies to the Project Director, and Grants Officer (if applicable). Include, as applicable: <ul style="list-style-type: none"> ▪ Areas of non-compliance or potential risk, if any; ▪ Corrective actions required to be taken, if any, and the expected timeline for their completion; and ▪ A list of effective practices found. Be sure to maintain/paste a copy of the letter in the appropriate eGrants text field or to upload it to the eGrants Monitoring Module using the document attachment function.
5. Record in eGrants that follow up actions are required and the date by which all actions must be completed.
6. When required follow up actions are completed by the sponsor, record in eGrants that all follow up actions were completed and the date. Be sure to maintain/paste a copy of the sponsor's response correspondence in the appropriate eGrants text field.
7. Generate a Final/Completed letter and send to the sponsor within 30 calendar days after the sponsor completed follow-up actions. Be sure to maintain/paste a copy of the letter in the appropriate eGrants text field field or to upload it to the eGrants Monitoring Module using the document attachment function.
8. Record in eGrants the Monitoring Completed Date when all information for the monitoring record is complete and accurate.
9. (a) Generate Final/Completed Letter in eGrants and send to the sponsor within 30 calendar days after the visit. Be sure to maintain/paste a copy of the letter in the appropriate eGrants text field or to upload it to the eGrants Monitoring Module using the document attachment function. (b) Complete the steps in eGrants to record the Monitoring Completed Date when all information for the monitoring record is complete and accurate.
10. File: The Notification Letter, Findings/Actions Required Letters, any Interim Communications Monitoring Letters, No Findings Final Letter and the Monitoring Tool completed checklist must be uploaded using the eGrants monitoring module document attachment function as applicable. Place signed copy of the completed Compliance Monitoring Guide and follow up and/or final/completed letter in the project file, along with copies of any documentation collected that supports the responses to protocol questions. Be sure to safeguard any personal information that may be contained in the documentation.

III. SPONSOR AND GRANT INFORMATION

Sponsor Name:	
Project/Grant Number:	
Project Start Date: _____	Project End Date: _____
Budget Period for Period Examined, Start Date: _____ Budget Period End Date: _____	
Type of Project: <input type="checkbox"/> Standard <input type="checkbox"/> Support (Amount: _____) <input type="checkbox"/> Program	
Person(s) Conducting Visit: _____	Date(s) of Visit: _____

Key Sponsor/Project Personnel			
	Name	Telephone Number	E-mail Address
Executive Director/CEO			
Other Authorizing certifying official			
Supervisor of Project Director			
Project Director			
Other Project Staff			
Controller			
Bookkeeper			
Any other Key Financial Personnel			
Sponsor's External Auditor			
Member of Community Participation Group (i.e., Board of Director's or Project Advisory Group)			

IV. MONITORING PROTOCOL

SECTION A. PROGRAM REQUIREMENTS (COMPLIANCE ISSUES)

Instructions:

- Answer these questions based on interviews with sponsor staff, VISTAs, and community members and information in the project files.
- Where appropriate, select documents to examine using a random sampling review of sponsor records.
- Sample sufficient files to make a reasonable and informed judgment to determine that the operation of the project conforms to governing laws, regulations, and policy.
- If you need more space to respond to any question, feel free to put “See Attachment” in response directly on this form and then attach a responsive document, as appropriate, such as a detailed explanation and/or responsive documentation.
- Keep a log of documents examined, items checked, and results.
- Make and retain copies of documents that demonstrate major compliance concerns.
- Questions in this section relate to specific statutory provisions, regulations, OMB Circulars, Memorandum of Agreement terms and conditions, or other documents and relate to issues that could result in a compliance finding.

PROJECT OPERATIONS, MANAGEMENT, AND PERFORMANCE

<p>A.1. Does the sponsor operate the project in accordance with the approved project application? If not, please explain.</p> <p>References: Memorandum of Agreement; DVSA, SEC. 103 (42 U.S.C.§ 4953)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.2. Is there evidence that the sponsor is engaging in best efforts to accomplish the project goals described in the approved project application?</p> <p>References: Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.3. Is there evidence that project beneficiaries are persons who are affected by poverty and poverty-related problems?</p> <p>If not, please explain:</p> <p>References: DVSA SEC. 101 (42 U.S.C. § 4951); 45 CFR Part 1222</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.4. To the maximum extent practicable, does the sponsor involve the people of the community to be served by the project in its planning, development, and implementation?</p> <p>References: DVSA SEC. 106 (42 U.S.C. § 4956); 45 CFR Part 1222; Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>A.5. Is there an active community participation group (i.e., Board of Director's/Project Advisory Group, as appropriate)?</p> <p>If not, please explain:</p> <p>If so, then please complete the following items:</p> <p>(a) Do project beneficiaries comprise a majority membership of this group?</p> <p>(b) What is the role of this group?</p> <p>(c) Are there any issues to be resolved concerning their involvement? If so, please describe.</p> <p>References: DVSA SEC. 106 (42 U.S.C. § 4956); 45 CFR Part 1222</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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VISTA ASSIGNMENT, SUPERVISION AND SUPPORT

<p>A.6. Is there a VISTA Assignment Description (VAD) for each VISTA and/or Leader?</p> <p>If not, please explain.</p> <p>Reference: VISTA Member Handbook Chapter 2; Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.7. Does the VAD accurately identify the actual activities of the VISTAs and/or Leader, and is it consistent with the goals of the project application?</p> <p>If the response to the above is no, please explain.</p> <p>References: VISTA Member Handbook Chapter 2</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.8. Does the sponsor provide on-site orientation and training (OSOT) for all incoming VISTAs at the beginning of their service? If no, please explain.</p> <p>References: Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.9. Is day-to-day supervision of VISTAs, Leaders and Summer Associates provided, consistent with what is described in the approved Project Application?</p> <p>If not, please explain.</p> <p>References: Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>A.15. Are approved V-81 forms on file for VISTAs involved in project-related travel? If no, please explain.</p> <p>References: VISTA Member Handbook Chapter 7; see Federal Tort Claims Act, 28 U.S.C. § 2671</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.16. Are VISTAs being reimbursed for service-related transportation in a timely manner, as described in the approved project application? If no, please explain.</p> <p>References: Memorandum of Agreement; VISTA Member Handbook, Chapter 7</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.17. VISTAs, Summer Associates, and Leaders are required to serve full-time. Is there evidence that VISTAs, Summer Associates, or Leaders are not serving full-time? If yes, please explain.</p> <p>References: DVSA Sec. 104.(42 U.S.C. § 4954) (a); VISTA Member Handbook Chapter 1</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.18. VISTAs and/or Leaders are eligible for leave benefits during their term. Is there evidence that VISTAs and/or Leaders are exceeding their leave allowances? If yes, please explain.</p> <p>References: DVSA Sec. 105(b).(42 U.S.C. § 4955 (b)); VISTA Member Handbook Chapter 9; Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.19. Is there evidence that the living allowances of VISTAs, Summer Associates, or Leaders are being supplemented in a manner that would interfere with the member’s experience of living at or below the poverty level? Is there evidence that sponsors or subrecipients are offering cash to members? Is there evidence that the sponsor or subrecipient[s] are not offering all members comparable support? If yes, please explain.</p> <p>References: Memorandum of Agreement; see DVSA SEC. 104.(a) (42 U.S.C. § 4954 (a)); VISTA Member Handbook Chapter 14; Policy 12-006: Sponsor Financial Support of VISTAs</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.20. Is there evidence that a VISTA, leader or Summer Associate is employed while also assigned to serve at the project site? If so, is there any evidence that staff at the project site are aware of the VISTA’s outside employment? If yes, please explain.</p> <p>References: VISTA Member Handbook, Chapter 1</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.21. Is there an approved Teleservice form on record for any VISTA who is teleserving?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

References: [VISTA Member Handbook](#) Chapter 13

A.22. Is there evidence of non-compliance in the following areas?

(1) Prohibited Political Activities (Non-Hatch Act): Sponsor staff using federal (CNCS) funds indirectly or directly for, any of the following activities:

- Influencing the outcome of any Federal, State or local election
- Voter registration activity
- Voter transportation to polls,
- Efforts to influence the passage or defeat of legislation

Reference: [DVSA](#), SEC. 403(b) (42 U.S.C. §5044(b)); [VISTA Member Handbook](#)

Yes

No

(2) Prohibited Political Activities (Hatch Act): VISTAs, Leaders, or Summer Associates engaging in any political activities prohibited under the Hatch Act including:

- Using official authority or influence to influence an election
- Soliciting or discouraging political activity of any individual or organization with business before CNCS (e.g., a grantee or VISTA project)
- Engaging in political activity while in service time, the office of a VISTA project, or using a vehicle owned or leased by a VISTA project
- Being a candidate for public office in a partisan election
- Wearing political buttons during service hours
- Engaging in political activity while wearing an article of clothing, badge, insignia or other similar item identifying CNCS or the VISTA program

Reference: [DVSA](#), SECs. 403(b), 415(b) (42 U.S.C. §§ 5044(b), 5055(b)); 5 U.S.C. chapter 73

Yes

No

(3) VISTAs, Leaders, or Summer Associates, sponsor staff or subrecipient staff requesting or receiving compensation from the beneficiaries of the VISTA project.

Reference: [DVSA](#), SEC. 404(c) (42 U.S.C. §5044(c)); Memorandum of Agreement

Yes

No

(4) VISTAs, Leaders, or Summer Associates activities or VISTA grant funds being used to assist labor or anti-labor organizations or related activity.

Reference: [DVSA](#), SEC. 404(d) (42 U.S.C. §5044(d)); Memorandum of Agreement

Yes

No

(5) VISTAs, Leaders, or Summer Associates gave religious instruction, conducting worship services, or engaging in proselytization as part of their duties and, if the sponsor is an organization that conducts inherently religious activities, those activities are offered separately, in time and location, from the programs or services under the CNCS award.

Reference: [VISTA Member Handbook](#); Memorandum of Agreement

Yes

No

(6) Sponsors that conduct inherently religious activities: Sponsor does not offer or carry out those activities separately, in time and location, from the programs or services under the CNCS award.

Reference: [VISTA Member Handbook](#).

Yes

No

<p>If the answer is yes to any of the above, please explain.</p>		
<p>A.23. Is there evidence that a VISTA who is related by blood, marriage, or adoption to sponsor or subrecipient staff, officers or members of the sponsor’s Board of Directors is assigned to the sponsor or subrecipient site? If yes, please explain.</p> <p>References: VISTA Member Handbook Chapter 14; Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.24. Is there evidence that a person holding the position of Project Director or supervisor has a member of his/her immediate family exercising supervisory authority over them? If yes, please explain.</p> <p>References: VISTA Member Handbook Chapter 14; Memorandum of Agreement)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

VERIFICATION OF CERTIFICATIONS AND ASSURANCES

<p>A.25. (a) To the best of your knowledge, in the last two years, has the sponsor or any of the subrecipient sites had discrimination complaints filed against them regarding services provided under this project or had civil rights compliance reviews regarding services conducted?</p> <p>References: Item #6 of “Assurances” submitted with VISTA Project Application</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>If the answer to A.24(a) is yes, respond to the following questions:</p>		
<ul style="list-style-type: none"> • Was discrimination or non-compliance found? 	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<ul style="list-style-type: none"> • What relief or remedial actions were taken? (describe) 		
<ul style="list-style-type: none"> • Is there any evidence that the project is not presently in compliance with applicable federal 	<input type="checkbox"/>	<input type="checkbox"/>

<p>statutes relating to nondiscrimination as embodied in the program regulations prohibiting nondiscrimination 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?</p> <p>If so, please explain.</p>	Yes	No
<ul style="list-style-type: none"> Is there any evidence that the a person with responsibilities in the operation of the project has discriminated against any AmeriCorps VISTA member, or member of the staff of, or beneficiary of the project, with respect to any aspect of the project on the basis of race, religion, color, national origin, sex, sexual orientation, age, disability, political affiliation, marital or parental status, or military service? <p>Reference: Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>(b) Has the sponsor conducted the physical accessibility self-evaluation required by 45 CFR 1232.7(c) or by a similar statute?</p> <p>If not, please explain.</p> <p>Reference: “Nondiscrimination on Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance” 45 CFR §1232.7(c); Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>(c) Is the project facility, when considered in its entirety (i.e. including all subrecipient sites) physically accessible to persons with mobility, hearing, vision, mental and cognitive impairments or addictions and diseases?</p> <p>If not, please explain.</p> <p>Reference: Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §794; “Nondiscrimination on Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance” 45 CFR §1232.7(c); Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>(d) Is the project language accessible to persons with limited English Proficiency?</p> <p>If not, please explain.</p> <p>References: “Notice of Policy Guidance on Title VI’s Prohibition Against National Origin Discrimination as it Affects Limited English Proficiency Persons” published in the Federal Register (Vol. 66, No. 10) January 16, 2001, pp. 3548-3555</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p><u>MULTI-SITE PROJECTS</u></p>		
<p>A.26. For multi-site projects: Has the sponsor provided information to current subrecipient project sites (“subrecipients”) on the conditions of VISTA service?</p> <p>If not, please explain:</p> <p>References: Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.27. For multi-site projects: Has the sponsor entered into a subrecipient agreement with each subrecipient? Does each subrecipient agreement contain at least the following elements? If not, please explain.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>(1) Project Plan to be implemented by the subrecipient. (A description of the activities to be performed, a schedule for completing the activities, and a budget in sufficient detail to provide a sound basis for the sponsor to monitor performance under the agreement effectively)</p> <p>(2) Records and reports. (The particular records the subrecipient must maintain and the particular reports the subrecipient must submit are specified in order to assist the recipient in meeting its recordkeeping and reporting requirements.)</p> <p>(3) Responsibilities of the parties and other program requirements. (Requiring that the subrecipient is to carry out each activity in compliance with all Federal laws and regulations described in sections 4, 5, 7, 8, and 9 of the Sponsor Obligations part of the Memorandum of Agreement.)</p> <p>(4) Suspension and termination policies and procedures. (Specifies that termination of that agreement may occur if the subrecipient materially fails to comply with any its term.)</p> <p>References: Memorandum of Agreement;</p>		
<p>A.28. Are all subrecipient sites public agencies or private non-profit organizations? (There are no subrecipient sites that are private commercial (for-profit) organizations.)</p> <p>References: VISTA Member Handbook Chapter 1; DVSA, SEC. 103 (a) (42 U.S.C. 4953(a)); Memorandum of Agreement</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.29. Has the sponsor delegated or assigned any of its obligations or duties under the VISTA project to any entity other than a subrecipient project site?</p> <p>If so, please explain.</p> <p>References: Memorandum of Agreement.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.30. Has the sponsor ensured VISTA supervisor training for sub recipient project site supervisors?</p> <p>If not, please explain.</p> <p>References: Memorandum of Agreement; Supervisor Manual Ch 2</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.31. Is there evidence that the sponsor requires or accepts application fees from potential subrecipients, or requires sub recipient sites to contribute financially to the project beyond cost share or reimbursement for reasonable and actual costs incurred for project administration provided by the sponsor?</p> <p>If so, please explain.</p> <p>References: Memorandum of Agreement.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

CRIMINAL HISTORY CHECKS

<p>A.32. For projects that receive VISTA grant funds for staff salary: For VISTA <u>grant-funded employees</u> (at either the grantee and sub recipient level) who were hired on or after October 1, 2009 and are still employed, does the sponsor maintain written documentation on file that it conducted a name-based search of the Department of Justice’s National Sex Offender Public Registry (NSOPR)?</p> <p>If not, please explain:</p> <p>References: Section 189D(a) of the National Community Service Act of 1990, as amended by the Serve America Act of 2009; 42 USC1265g(a)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.33. For projects that receive VISTA grant funds for staff salary: For VISTA <u>grant-funded employees</u> (at either the grantee and sub recipient level) who were hired on or after October 1, 2009 but prior to April 1, 2011 and are still employed, does the sponsor maintain written documentation on file that it conducted one of the following:</p> <p>(a) state criminal history checks; or</p> <p>(b) FBI fingerprint checks</p> <p>Has the sponsor conducted and documented one of these checks?</p> <p>References: Section 189D(a) of the National Community Service Act of 1990, as amended by the Serve America Act of 2009; 42 USC1265g(a)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.34. For projects that receive VISTA grant funds for staff salary: For VISTA <u>grant-funded employees</u> (at either the grantee and sub recipient level) who were hired on or after April 1, 2011 and are still employed, and who do not have recurring access to vulnerable populations, does the sponsor maintain written documentation on file that it conducted one of the following:</p> <p>(a) state criminal history checks; or</p> <p>(b) FBI fingerprint checks</p> <p>Has the sponsor conducted and documented one of these checks?</p> <p>References: Section 189D(a) of the National Community Service Act of 1990, as amended by the Serve America Act of 2009; 42 USC1265g(a)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>A.35. For projects that receive VISTA grant funds for staff salary and benefits : For VISTA <u>grant-funded employees</u> (at either the grantee and sub recipient level) who were hired on or after April 1, 2011 and are still employed, and who have recurring access to vulnerable populations, does the sponsor maintain written documentation on file that it conducted both of the following:</p> <p>(a) state criminal history checks; and</p> <p>(b) FBI fingerprint checks</p> <p>Has the sponsor conducted and documented both of these checks?</p> <p>References: Section 189D(a) of the National Community Service Act of 1990, as amended by the Serve America Act of 2009; 42 USC1265g(a)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

SECTION B. FISCAL REQUIREMENTS - FOR PROGRAM AND SUPPORT GRANT PROJECTS ONLY (COMPLIANCE ISSUES)

Instructions:

- This section is organized so you gain an understanding of the VISTA grantee’s internal controls and then test various transactions to ensure the grantee is utilizing the controls over its grant’s financial activity.
- Begin by asking the grantee to provide an overview of its fiscal system, describing the process for all types of income (both cash and in-kind) and expenditures. Also, obtain a copy of the Written Policies and Procedures for their accounting functions.
- Once you have gained an understanding of how the grantee processes their accounting transactions, you will test what you have learned to ensure they are following their procedures. You should focus on proper signoffs and approvals of expenses as well as draw downs.
- Use the most recent FFR and review a sample of source documents that were used to support the federal and any non-federal funding reported on the FFR to assure the reasonableness and adequacy of the fiscal systems. The financial management systems of grantees should produce an accurate and complete disclosure of activities. Check to see if the sponsor has recorded hours correctly, i.e., cumulative over each budget year.
- Keep a log of documents examined, items checked, and results.
- Make and retain copies of documents that demonstrate major compliance concerns.
- Questions in this section relate to specific statutory provisions, regulations, OMB Circulars, Memorandum of Agreement terms and conditions, or other documents and relate to issues that could result in a compliance finding.

[45 CFR Part 2541](#): “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments”
[45 CFR Part 2543](#): “Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations.”
[OMB Circular A-21](#): “Cost Principles for Educational Institutions” [[Relocated to 2 CFR, Part 220](#)]
[OMB Circular A-87](#): “Cost Principles for State, Local and Indian Tribal Governments” [[Relocated to 2 CFR, Part 225](#)]
[OMB Circular A-122](#): “Cost Principles for Non-Profit Organizations” [[Relocated to 2 CFR, Part 230](#)]
[OMB Circular A-133](#): “Audits of States, Local Governments, and Other Non-Profit Organizations”

Fiscal Systems Review

<p>B.1. Are Notice of Grant Award (NGA) standard and special fiscal terms and conditions being met? If not, please explain:</p> <p>References: Terms and Conditions referenced in the NGA document for the grant period for which compliance is being reviewed.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.2. To respond to the items (a) and (b) below, for the period under review, ask the grantee to provide a ledger report from the accounting system that was used to create the FFR (Attach the ledger report to this protocol).</p> <p>References: 45 CFR § 2541.200 for State, Local and Indian Tribal Governments 45 CFR §2543.21 for Educational Institutions, Hospitals, and Other Non-Profit Organizations</p>		
<p>(a) Within the CNCS grant, are federal and non-federal funds tracked separately? Different funding sources should have different accounting codes.</p> <p>Note: Any time the Project Director or any other project staff spends on fund raising for</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>the project must be charged to non-federal funds or other funds available to the sponsor and not to the federal share.</p> <p>If not, please explain.</p>		
<p>(b) Do the totals on the ledger support expenditures reported on the FFR? (The total federal expenditures should total one account that is listed on the ledger. The non-federal total can be a total of more than one account.)</p> <p>If not, please explain.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p><u>Internal Controls Review</u></p>		
<p>B.3. (a) Does the sponsor’s accounting system provide timely financial reports to project staff that enables them to utilize properly and expend grant funds effectively, as budgeted?</p> <p>If not, please explain:</p> <p>References: 45 CFR §2541.200 for State and Local Governments, Indian Tribes 45 CFR §2543.21 for Educational Institutions, Hospitals and Other Nonprofit Organizations.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.4. Is the Project Director aware of the project’s current financial status and actively managing the budget?</p> <p>If not, please explain.</p> <p>References: 45 CFR §2541.200 for State and Local Governments, Indian Tribes 45 CFR §2543.21 for Educational Institutions, Hospitals and Other Nonprofit Organizations.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.5. Are bank statements reconciled monthly by someone other than the individual who signs the checks?</p> <p>If not, please explain.</p> <p>References: 45 CFR §2541.200 for State and Local Governments, Indian Tribes 45 CFR §2543.21 for Educational Institutions, Hospitals and Other Nonprofit Organizations.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.6. Are the people who prepare checks prohibited by policy and in practice from signing them?</p> <p>If not, please explain.</p> <p>References: 45 CFR §2541.200 for State and Local Governments, Indian Tribes 45 CFR §2543.21 for Educational Institutions, Hospitals and Other Nonprofit Organizations.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>B.7. (a) Does the sponsor have equitable written guidelines for approving cost reimbursements for VISTA service-related transportation, project staff travel, etc?</p> <p>(b) Are such policies applied consistently and in accordance with applicable regulations? If not, please explain.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.8. Does the sponsor retain financial records for at least 3 years following closeout of the last 3-year grant cycle, or three years past the last audit, whichever is most recent? If not, please explain.</p> <p>References: 45 CFR §2541.420 for State and Local Governments, Indian Tribes 45 CFR §2543.53 for Educational Institutions, Hospitals and Other Nonprofit Organizations.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.9. (a) Does the sponsor have equitable written guidelines for approving cost reimbursements for VISTA service-related transportation, project staff travel, etc..?</p> <p>(b) Are such policies applied consistently and in accordance with applicable regulations? If not, please explain.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<u>Testing</u>		
<p>B.9 Is there adequate documentation to verify expenses in budget categories (a) through (g) below?</p> <p>For each of the expense categories in sub-items B.9.(a) through B.9.(g) below, follow these instructions for sampling source documentation:</p> <ul style="list-style-type: none"> ▪ For item (a) Personnel/Staff, randomly select 3 to 4 pay periods and examine the time sheets, or equivalent, for each staff member for the periods selected. ▪ For items (b) through (e), randomly select and examine 3 to 4 source documents (vouchers, invoices, etc.) for each type of expenditure. <ul style="list-style-type: none"> ○ For each expense category note any issues pertaining to the documentation provided. Documentation must be reliable, complete, and accurate. <p>References: OMB Circular A-21, Attachment, Section J ” [Relocated to 2 CFR, Part 220] OMB Circular A-87, Attachment B [Relocated to 2 CFR, Part 225] OMB Circular A-122, Attachment B [Relocated to 2 CFR, Part 230]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>(a) Personnel/Staff</p> <p>For non-profit organizations:</p> <ul style="list-style-type: none"> ▪ Anyone who charges time to this grant should have timesheets prepared after the fact and signed physically or certified electronically by the employee and the 	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>employee’s supervisor.</p> <ul style="list-style-type: none"> ▪ For an employee who is less than 100% billed to the grant, there should be support documentation of how many hours is spent on each cost objective. The documentation must be 1) after the fact, 2) account for total hours worked, 3) be prepared at least monthly, and 4) be signed physically or certified electronically by the supervisor. <p>For state and local governments:</p> <ul style="list-style-type: none"> ▪ If an employee works only on the VISTA grant, support documentation for salary should be at least semi-annual periodic certifications by the employee. ▪ For an employee who is less than 100% billed to the grant, there should be support documentation of how many hours is spent on each cost objective. The documentation must be 1) after the fact, 2) account for total hours worked, 3) be prepared at least monthly, and 4) be signed physically or certified electronically by the supervisor. <p>For educational institutions:</p> <ul style="list-style-type: none"> ▪ Educational institution must have a payroll distribution system which meets specific criteria and standards described in OMB Circular A-21, J. Section 10 “Compensation for Personal Services.” Such a system must recognize the principle of after the fact confirmation or determination of personnel costs. The Circular states: “Confirmation by the employee is not a requirement if other responsible persons make appropriate confirmations.” Typically such systems are approved by the institution’s cognizant audit agency and embodied in a manual or handbook. <p>Documentation issues:</p>		
Make a log of documentation examined, items checked, and results.		
<p>(b) Fundraising</p> <p>Are organized fund raising expenses (including staff salaries, benefits and related costs) paid for by the sponsor with funds from sources other than the federal share of the grant?</p> <p>Organized fund raising expenses include, for example, time and related costs for:</p> <ul style="list-style-type: none"> ▪ Writing grants for new funding, including new CNCS grants; ▪ Soliciting specific gifts and bequests (cash or in-kind); ▪ Applying for support from local community foundations such as United Way; ▪ Financial campaigns; ▪ Endowment drives; ▪ Solicitation of gifts and bequests; and ▪ Similar expenses incurred solely to raise capital or obtain contributions. <p>Organized fund raising expenses <u>do not include</u>, for example, time and related costs for:</p> <ul style="list-style-type: none"> ▪ Negotiating a grant budget following approval of a grant application; ▪ Applying for a continuation for Years 2 and 3 of any existing VISTA project; ▪ Providing information about the project to a grant writer; ▪ Preparing and distributing a newsletter, or maintaining a website, that includes information about how to make donations to support project activities; and 	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<ul style="list-style-type: none"> ▪ Responding to questions or providing information to state or local governments that may decide to contribute to the cost of a program. <p>Documentation issues:</p> <p>Make a log of documentation examined, items checked, and results.</p> <p>References: OMB Circular A-21, Attachment, Section J ” [Relocated to 2 CFR, Part 220] OMB Circular A-87, Attachment B [Relocated to 2 CFR, Part 225] OMB Circular A-122, Attachment B [Relocated to 2 CFR, Part 230]</p>	
<p>(c) Travel and Transportation</p> <p>Staff travel vouchers should be signed physically or certified electronically by employee, approved by the employee’s supervisor and/or other authorized grantee official, and display expenses, mileage, dates, and project-related purpose of travel. Payments/reimbursements should be in accordance with the sponsor’s written travel policies and procedures and the rate should be based on the rate established by the Federal Travel Regulations or the rate at which the organization reimburses, whichever is lower.</p> <p>Documentation issues:</p> <p>Make a log of documentation examined, items checked, and results.</p>	<input type="checkbox"/> Done
<p>(d) Supplies</p> <p>VISTA grant funds may not be used for supplies. Records must show that the no grant funds are used for supplies.</p> <p>Documentation issues:</p> <p>Make a log of documentation examined, items checked, and results.</p>	<input type="checkbox"/> Done
<p>(e) Contractual Services</p> <p>Records must show that the services were acquired in accordance with the grantee’s written procurement procedures, as required by 45 CFR §2543.44 and §2543.45, specifically for the VISTA project, that they are reasonable, necessary, and allowable for the grant, and that compensation was within agreed upon contractual terms. (This applies to Program Grants that administer payroll.)</p> <p>Documentation issues:</p>	<input type="checkbox"/> Done

<p>Make a log of documentation examined, items checked, and results.</p>		
<p>(f) Other Volunteer Support Costs</p> <p>Documentation issues:</p>	<input type="checkbox"/> Done	
<p>Make a log of documentation examined, items checked, and results.</p>		
<p>(g) Volunteer Expenses</p> <ul style="list-style-type: none"> • Other Allowable Expenses, including, but not limited to, the following applicable and allowable items. (Records must show that all expenses were incurred for project-related activities): <p>Documentation issues:</p>	<input type="checkbox"/> Done	
<p>Make a log of documentation examined, items checked, and results.</p>		
<p>B.10. Are all costs reviewed during this site visit that are charged to the grant and included in the FFR necessary, allowable, and reasonable?</p> <p>If not, please explain.</p> <p>References: 45 CFR §2541.200 for State and Local Governments, Indian Tribes 45 CFR §2543.21 for Educational Institutions, Hospitals and Other Nonprofit Organizations</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p><u>Volunteer Records</u></p>		
<p>B.11. For VISTA Program Grant Projects: Do expenditures for living allowances agree with the reported active VISTAs?</p> <p>If not, please explain.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>B.12. For VISTA Program Grant Projects: Do expenditures for end of service cash stipends agree with the records of VISTAs who elected the end of cash stipend (see My AmeriCorps records)?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>(c) Are reimbursements for transportation paid in a timely manner, in accordance with grantee policies and procedures?</p> <p>If not, please explain.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

REMINDER: If any fiscal review findings are noted in this section, report findings to the Field Financial Management Center Grants Officer.

SECTION C. PROGRAMMING AND COMMUNITY PARTICIPATION, SPONSOR OPERATIONS, SUSTAINABILITY (RECOMMENDED PRACTICES AND OTHER CONSIDERATIONS)

Instructions:

- Answer these questions based on interviews with sponsor staff, VISTAs, and community members and information in the project files.
- Where appropriate, select documents to examine using a random sampling review of sponsor records.
- Sample sufficient files to make a reasonable and informed judgment to determine that the operation of the project conforms to governing laws, regulations, and policy.
- If you need more space to respond to any question, feel free to put “See Attachment” in response directly on this form and then attach a responsive document, as appropriate, such as a detailed explanation and/or responsive documentation.
- Keep a log of documents examined, items checked, and results.
- Make and retain copies of documents that demonstrate major concerns.
- Questions in this section are based on prudent management practices and other non-compliance related considerations. These questions do not relate to specific statutory provisions, regulations, OMB Circulars, Memorandum of Agreement terms and conditions, or other documents and therefore could not result in a compliance finding.

<p>C.1. Has there been a significant shift from the project plan goals and measures as described in the application? If yes, please explain the shift and whether it has affected the length of the project?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.2. Is there evidence that project activities will continue beyond the support of VISTA resources?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.3. From your observations, do community members undertake other activities and roles in support of the project, aside from participating in the project’s community participation group (i.e., Board of Director’s/Project Advisory Group, as appropriate)?</p> <p>Please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.4. Are the CEO/ED and Board of Directors (or equivalent, if public sector organization) exercising appropriate management control and oversight of the project?</p> <p>Describe briefly.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.5. Has the sponsor assigned someone to directly supervise the Project Director?</p> <p>If yes, briefly explain where this person fits into the sponsor’s organizational structure.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.6. Is the Project Director’s performance reviewed annually?</p>	<input type="checkbox"/>	<input type="checkbox"/>

If not, or if weaknesses noted, specify.	Yes	No
<p>C.7. Does the Project Director’s supervisor review project reports, plans and other documents, meet with staff regularly, help identify priorities, and otherwise demonstrate commitment to and support of the project?</p> <p>If not, please explain the supervision provided.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.8. Are there any concerns about the Project Director’s management of the project?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.9. Has there been frequent turnover of project staff?</p> <p>Has project performance or member management suffered as a result?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.10. Other than routine supervision of the Project Director, has the sponsor put into place any other systems and practices to oversee project performance? (E.G., program review meetings, consultations with the community participation group, VISTAs, and subrecipient staff, etc.).</p> <p>Please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.11. Where appropriate, does the sponsor partner with organizations to further support the project?</p> <p>If yes, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.12. Where appropriate, does the sponsor recognize the contributions of National Service resources to the project ?</p> <p>If yes, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>C.13. Describe any exemplary practices employed by the sponsor or project staff.</p>		

SECTION D. VISTA RECRUITMENT, ASSIGNMENT, AND SUPPORT
(RECOMMENDED PRACTICES AND OTHER CONSIDERATIONS)

Instructions:

- Answer these questions based on interviews with sponsor staff, VISTAs, and community members and information in the project files.
- Where appropriate, select documents to examine using a random sampling review of sponsor records.
- Sample sufficient files to make a reasonable and informed judgment to determine that the operation of the project conforms to governing laws, regulations, and policy.
- If you need more space to respond to any question, feel free to put “See Attachment” in response directly on this form and then attach a responsive document, as appropriate, such as a detailed explanation and/or responsive documentation.
- Keep a log of documents examined, items checked, and results.
- Make and retain copies of documents that demonstrate major concerns.
- Questions in this section are based on prudent management practices and other non-compliance related considerations. These questions do not relate to specific statutory provisions, regulations, OMB Circulars, Memorandum of Agreement terms and conditions, or other documents and therefore could not result in a compliance finding.

D.1. Is there evidence that the sponsor has an effective recruitment strategy for VISTAs, Leaders, and/or Summer Associates?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.2. Does the sponsor have an accurate, effective recruitment listing on the My AmeriCorps portal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.3. Is there evidence that the sponsor uses the Project Plan and VISTA Assignment Description (VAD) in the interview process?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.4. Is there a standard set of questions asked of each VISTA applicant during interviews?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.5. Has the VAD accompanied each member application prior to PSO?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.6. Are VISTAs, Leaders, or Summer Associates satisfied with their assignments and with project operations in general? Explain briefly:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.7. Has there been frequent early terminations of VISTAs, Leaders, or Summer Associates? If so, why? Has project performance suffered as a result?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.8. Does the sponsor have a process for appraising performance of VISTAs, Leaders, or Summer	<input type="checkbox"/>	<input type="checkbox"/>

Associates?	Yes	No
D.9. Are there any indicators (e.g. media coverage, fund raising events, awards etc.) that VISTAs, Leaders, or Summer Associates services are recognized and valued by the sponsor and by the community at large? If so, please describe briefly.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.10. Educational opportunities: a) Are any members taking educational courses? b) If yes, have the classes been approved by the VISTA Supervisor? c) Are the members provided the opportunity for training throughout their service? Provide examples: computer training, grant writing courses, site-specific training, etc. d) What type of career development assistance has been provided?	<input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No
D.11. Does the sponsor have a system in place in order to complete the on-site verification forms in an accurate, consistent and timely manner?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.12. Does the sponsor have a system in place to document attendance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.13. Are VISTAs involved in the completion of Project Progress Reports? If yes, please explain.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.14. Do VISTAs, Leaders, and/or Summer Associates have an eGrants account? If yes, please explain.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<u>MULTI-SITE PROJECTS</u>		
D.15 Is/are the site supervisor(s) adequately familiar with the scope of the project and the basic policies, laws, and regulations governing the project?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.16 Has/have the site supervisor(s) demonstrated the experience and qualifications needed to manage the day-to-day operations of the project on site? If no, give a brief explanation.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.17. Does the sponsor ensure that the Project Director and each site supervisor is aware of the VISTA Supervisor Handbook and VISTA Member Handbook? VISTA Campus? Please explain.	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
D.18. Does the sponsor have a system to share information, best practices among VISTAs and staff across project sites?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
D.19. Does the sponsor monitor the activities supported by the project and any sub recipients to assure compliance with applicable Federal requirements and that performance goals are being achieved?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
List any training and technical assistance needs in this area. Identify any exemplary practices in this area that may be helpful or are worth sharing with other projects in the state.		



V. SUMMARY OF FINDINGS, RECOMMENDED PRACTICES AND OTHER CONSIDERATIONS

1. Please summarize all issues and findings in the post-site visit feedback letter using the template provided on the S drive at: S:\everyone\Monitoring & Oversight\Intranet Site\Monitoring Guides\Letter Templates and at <http://portal.cns.gov/CNCSDepartments/-OfficeofFieldLiaison/TrainingResources/ComplianceMonitoring/PostSiteVisitActivitiesFeedbackLetters.aspx>.

The feedback letter template has been designed to provide more consistent and concise feedback to all sponsors and for ease of use for CNCS staff. Use of these templates will help assure uniform quality. OFL has approved and requires all OFL staff to use these templates.

2. Attach, where available, copies of documentation supporting compliance findings, and additional pages or backup information regarding performance, T/TA needs, or effective practices.

3. Please review the post-site visit resources on the Office of Field Liaison intranet site located at:

<http://portal.cns.gov/CNCSDepartments/-OfficeofFieldLiaison/TrainingResources/ComplianceMonitoring/PostSiteVisitActivitiesFeedbackLetters.aspx>

VI. SIGNATURE

PERSON COMPLETING REPORT: _____ DATE: _____

TITLE: _____

VII. APPENDICES

Information gathered through interviews can help you to complete Sections A-D of the Guide.

Each of the following appendices is a list of open-ended questions that may be used to *help guide a discussion* with listed parties during a site visit. It is not meant as a survey. Questions should be added or deleted as appropriate.

- A. INTERVIEW QUESTIONS FOR PROJECT DIRECTOR**
- B. INTERVIEW QUESTIONS FOR SITE SUPERVISOR(S)**
- C. INTERVIEW QUESTIONS FOR VISTAS**
- D. INTERVIEW QUESTIONS FOR MEMBER(S) OF BOARD OF DIRECTOR'S/PROJECT ADVISORY GROUP**

A. INTERVIEW QUESTIONS FOR PROJECT DIRECTOR

Overall Project Director

Questions to be asked of the project director

The following is a list of questions that may be used to *help guide a discussion* during a site visit. It is not meant as a survey. Questions should be added or deleted as appropriate.

1. Is there a current sub recipient agreement (Memorandum of Understanding, MOU) with each operating site?

2. Describe how you communicate and interact with your sites? Who do the Site Supervisors contact if they have questions? How often do you (the Project Director) meet with the Site Supervisors?

1. Have you have attended CNCS's Supervisor Orientation?

2. Is/are Site Supervisor(s) knowledgeable about the project plan, adequately familiar with the project plan and desired accomplishments, VISTA assignment descriptions (VADs), and plan for supervision?

3. How are Site Supervisors involved in the completion of Project Progress Reports and in the development of project renewal applications?

4. What is the role of site supervisors in data collection regarding VISTA activities and accomplishments?

5. Is/are Site Supervisor(s) aware of statute, regulations, and policies governing the project?

6. Has/have the Site Supervisor(s) had the experience and qualifications needed to manage the day-to-day operations of the project site? If no, explain.

7. Are candidates provided a copy of the overall project plan and a site specific work plan prior to attending Pre-Service Orientation (PSO)?

8. What percent of time are you (the Project Director) and the Site Supervisors spending

working directly with the VISTA members?

9. Who does a Site Supervisor notify if a VISTA is not showing up to the project or resigns?
10. Do you have access to a VISTA Supervisor Handbook and Member Handbook?
11. Discuss how you coordinate and facilitate training opportunities between your sites. How are you ensuring that on-site orientation and training (OSOT) is occurring at each site?
12. How do you communicate with the Site Supervisor to know if a VISTA member is still on project to be able to complete the bi-weekly verification form?
13. Describe what action you take in the following situations.
 - Pay issues (e.g. direct deposit, overpayments)
 - Service-related transportation
 - Member absence from the project without approved leave
 - Member accident while in service
 - Member dissatisfaction with service experience
 - Health coverage issues
 - Child care issues
 - Housing issues
14. Are you familiar with the progress at each site?
15. Are you familiar with what VISTAs are doing at each site?
16. Do you have a strategy for monitoring compliance with programmatic and fiscal requirements of subrecipient sites? If so, what is it?
17. What types of tools do you use for collecting data to measure progress? Do the tools collect the data needed for the performance measures? Do you review data throughout the year to determine if you are on track for meeting its measures?
18. How do you involve project beneficiaries in the project?

19. Do you have a project advisory group? How often do they meet? Describe how you incorporate them in measuring program effectiveness and quality. Does it use the results for the continuous improvement of the program?
20. Describe how you recruit VISTA members.
21. How does your organization determine who is assigned as the authorized representative who is charged with the responsibility of signing the certifications and assurances for the grant?
22. How does your organization keep the Board, administrators, senior management, and other internal stakeholders informed of successes and challenges with the project?
23. How do you plan to build organizational capacity to help sustain program activities?

Additional Questions for Cost-Share Projects

1. If the pre-visit checklist finds that the sponsor is not up-to-date on their payments, ask the following questions:
 - a) Who is receiving the invoice at the sponsoring organization?
 - b) Who is authorizing payments?
 - c) To whom are you sending payments at CNCS?
 - d) Are there any problems with the accuracy of the invoices? Were problems handled to your satisfaction?
2. What is the source of the cost-share funds? How reliable is this source for current/future cost sharing?
3. What plans do you have for continuing or expanding the cost-share portion of your project?

B. INTERVIEW QUESTIONS FOR SITE SUPERVISOR(S)

Site Supervisor

Questions to be asked of the Site Supervisors (make additional copies, if necessary)

The following is a list of questions that may be used to *help guide a discussion* during a site visit. It is not meant as a survey. Questions should be added or deleted as appropriate.

Site Information:

Overall
Sponsor Name:

Overall
Project
Supervisor:

Site
Supervisor:

Site Address:

Site
Telephone
Number:

Site Fax
Number:

E-mail
Address:

Site Project #
(if different):

Site Grant
(if
applicable):

1. Describe how you communicate and interact with the Project Director. How often do you meet with the Project Director? Who do you contact if you have questions?

2. Have you received orientation of VISTA terms conditions and benefits and supervision requirements from your Project Director? Yes No

3. What percent of your time is spent working directly with the VISTA members?

4. Are you familiar with the VISTA Supervisor Handbook and Member Handbook and how to access them? Yes No

5. Do you recruit your own VISTA members for your site? If yes, what is your recruitment strategy? Do you use the My AmeriCorps web-based recruitment system? Yes No

6. Are candidates provided a copy of the overall project plan and a site specific plan prior to attending Pre-Service Orientation (PSO)? Yes No

7. Please detail your on-site orientation and training for VISTAs.

8. Are you aware of when the VISTA resource will end?

Yes No

9. Describe what action you take in the following situations.

- Service-related transportation
- Member absence from the project without approved leave
- Member resignation
- Member accident while in service
- Member dissatisfaction with service experience
- Health coverage issues
- Child care issues
- Housing issues

10. How and when do you provide project and performance information to your supervisor (sponsor) on VISTA activities and accomplishments?

11. How are you involved in the completion of Project Progress Reports and in the development of project renewal applications?

C. INTERVIEW QUESTIONS FOR VISTAs

The following is a list of open-ended questions that may be used to *help guide a discussion* with VISTAs during a site visit. It is not meant as a survey. Questions should be added or deleted as appropriate.

Activities

1. What do you like best about what you do?
2. In assessing your project what do you think has been its greatest contribution to the community, in general, and the low-income community specifically?
3. Have you discussed your VISTA Assignment Description with your site supervisor?
4. Do you have any concerns about your VAD or about how your day-to-day activities align with your VAD?

Training

1. (If sponsor conducted PSO) Describe your PSO experience.
2. Describe your in-service training experiences.
3. Describe your on-site orientation and training (OSOT) provided by your sponsor. Did it prepare you for your role in the project?
4. How has your on-site training helped develop your life skills, e.g., networking, communication, time management?

Supervision

1. Describe your supervision. How often do you meet with your supervisor? How effective is the supervision that you receive?
2. Do you feel comfortable addressing service-related issues with your supervisor? Have you?
3. Are you serving full-time? How many hours do you average each week? Do you feel challenged by your assignment and rewarded by your experience?
4. Have you been assigned duties that you feel were outside your assignment description and/or project plan?

- a) Have you been assigned duties that you feel have jeopardized your safety or caused you to sustain injury?
- 5. Are you incurring service-related travel expenses? If so, are you reimbursed in a timely manner?
- 6. Have you experienced any concerns regarding the safety or inclusiveness of your workplace?

Resources

- 1. Does your supervisor/sponsor provide you with the administrative support (i.e., space, supplies, phones, equipment) needed to successfully accomplish your goals and objectives? If no, describe deficiencies.
- 2. Does your project need technical assistance from the CNCS state office?
- 3. Has CNCS staff been responsive to your needs?

D. INTERVIEW QUESTIONS FOR MEMBER(S) OF BOARD OF DIRECTOR'S/PROJECT ADVISORY GROUP

The following is a list of open-ended questions that may be used to *help guide a discussion* with during a site visit. It is not meant as a survey. Questions should be added or deleted as appropriate.

1. Does your group meet regularly? How often do you meet?

2. Are you familiar with the work that the VISTAs are doing? If so, how do you think the VISTA project is going? Do you have any concerns?

3. What is the role of your group? Do you believe that it has influence on the activities of the VISTA project? Are you involved in seeing that the project continues once the VISTAs are no longer a resource? If so, how are you involved?