

# Follow-up Q &A to AmeriCorps Financial Training

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**I. Question: Explain why public relations costs are considered allowable and marketing is listed as unallowable – Handout “OMB: Select Items of Cost”?**

Answer: Costs of selling or marketing the products or services of your organization in general would be considered unallowable (unless specifically allowed by prior approval of the federal awarding agency when necessary for the performance of the federal award). Allowable ‘Public Relations’ pertain to the cost of communicating and liaison with public, media and government necessary to inform on matters of public concern... The differences are nuanced

**II. Question: Explain what makes a group meal/food an expense allowable?**

Answer: Meals involving only staff, such as a regular scheduled staff meeting are typically unallowable. There needs to be a strong indicator as to why the meal was necessary during the meeting. Meals may be acceptable when people are traveling to attend and you want to keep people together as a group and the time involves training or relevant presentations by speakers. For example, in a day of training, you may schedule a presentation or training of AmeriCorps members during normal lunch period and provide food in order to keep them present and participating.

**III. Question: Could public service announcements (PSA’s) be considered unallowable as match?**

Answer: Generally donated PSAs could be allowable for the purposes of the grant such as recruiting AmeriCorps members or partnership opportunities. On rare occasion, organizations have received large PSA donations for AmeriCorps related activities and there have been a few cases where an auditor has recommended that the amount is unreasonable. One of their considerations was whether the organization would have otherwise purchased that amount of PSA if funds were available to do so.

**IV. Question: Can AmeriCorps State funds be used to match other National Service grants such as VISTA?**

Answer: No, Corporation funds cannot be used to match other Corporation grants.

**V. Question: What is debarment?**

Answer: These are actions that would prevent an organization from receiving a federal grant along with other funding opportunities. The government maintains a list of organizations that have been debarred and State Commissions check this list as part of their practices.

**VI. Question: What is the \$25,000 audit requirement for organizations?**

Answer: This requirement is not a federal or A-133 requirement for audit purposes. The \$25,000 threshold was part of the American Recovery and Reinvestment Act (ARRA) and pertained to vendor payments.

**VII. Question: Does the State Commission have a requirement for programs to include funds for staff training (i.e. National Conference on Volunteerism).**

Answer: No, the Commission is not currently requiring programs to budget for staff training costs.

**VIII. Question: Does the Commission require written approval when programs use other federal funds as match?**

Answer: The Commission requests documentation that the other federal funds can be used as match. This documentation could be an application as long as within the application is clearly lists that you will use the funds to match the AmeriCorps grant.

**IX. Question: Should activity logs be included on the timesheet?**

Answer: A time activity report, i.e. Member timesheets, has 3 primary components required to track AmeriCorps members' time/hours: Service, Training, and Fundraising (if applicable). At a minimum this means assigning hours to these activities on a timesheet signed by member and supervisor. Further breakdown of service may be desired by some organization and often is achieved by assigned a few additional codes reflecting the type of service, such as tutoring, mentoring or other categories.

However, some organizations may desire to have a more robust system to capture members' activities in descriptive detail and/or their reflections on service in written prose.

Combining the two may result in a cumbersome, difficult process to manage. As capture of members' time reports are essential to completing service and earning an education award, organizations requiring detailed reports or prose from members on their service activities should consider separating the crucial time-keeping on timesheets from the detailed service description reporting and reflection.

Follow-up: The Commission will come up with a set of guidelines and report back to programs.

**X. Question: When an audit results in questioned costs around education awards is there a set formula that CNCS uses to determine the prorated cost potential to the program and/or Commission?**

Answer: The Corporation used a formula during the last audit for the Commission. It's unknown if the same or similar formulas are being used in other state audits.

**XI. Question: Does the Commission require programs to approve all prorated education awards for personal compelling circumstances?**

Answer: No, programs do not need pre-approval from the Commission, but it is very important to document clearly in the member's file, the basis for such determination within the standards established in the grant provisions

**XII. Question: Can programs sign and date an NSOPR if the printed copy of the results does not show the date?**

Answer: No, in its just published final rule, CNCS requires documented record of the NSOPR search and results either by printing the screen or by some other method that retains paper or digital images of the NSOPW checks *inclusive of dates*. Otherwise, "...all grant costs related to the member will be disallowed."

**XIII. Question: Are we required to perform criminal history checks on individuals who are not listed in the budget?**

Answer: You must comply with the criminal history requirements for anyone whose position is associated in part or in whole with a CNCS grant either as CNCS share or the grantee share (match). This applies even if the individual is not specifically listed in the grant budget, e.g. the position could be in-kind match supervision at a site. Grantee share includes both cash and in-kind match. The requirement also applies to anyone who is subsequently added to the budget either as CNCS share or grantee share.