

AmeriCorps Compliance Monitoring Tool

Subrecipient Legal Name					
AmeriCorps Program Name					
Grant Number		Year		Risk Level	
Participating Subrecipient Staff					
Participating GOCS Staff					
Visit/Desk Review Date					
Note any follow-up items from previous monitoring below.					

This tool may be used solely by GOCS staff, or GOCS may ask subrecipient staff to fill in portions of the tool as an initial step. Understanding that AmeriCorps often changes authorities or guidance such as terms and conditions or NSCHC guidance, the applicable authorities and guidance are those effective during the relevant time (typically the most recent completed grant year or, for first-year programs, the first year). This tool will be updated every fiscal year. **GOCS may, at its discretion, use only portions of the tool that are relevant to assessed risk.**

Comments including a concise description and any relevant documentation are required for every question. A comment may be made to reflect “no change” from the subrecipient’s most recent monitoring, or to cite to any relevant policies, procedures, MOU or other contract language, financial records, staff or member files, member or supervisor handbooks, and/or practices. For many questions, it may be sufficient to refer to where the supporting information can be located, such as “site MOUs,” “simple log,” “emails w GOCS,” “HR files,” “website,” “member handbook,” or “general ledger.” For other questions, such as those in the section on Member Service Agreement, a reference to the page number and/or paragraph should be made.

If non-compliance is indicated, a comment should be made to provide any stated reasons or documentation behind the non-compliance, as well as existing or anticipated corrective actions.

GOCS may request additional information/documentation and augment or clarify any subrecipient comments.

Definitions. In this document,

- **AC** means AmeriCorps the agency, formerly known as the Corporation for National and Community Service.
- **AC Gen T&Cs** means the General Grant and Cooperative Agreement Terms and Conditions applicable to the relevant grant and program year(s).
- **ASN T&Cs** means the Terms and Conditions for AmeriCorps State and National Grants applicable to the relevant grant and program year(s).
- **CFR** means the Code of Federal Regulations.
- **Fed. Reg.** means the Federal Register.
- **GOCS** means the Montana Governor’s Office of Community Service.
- **MCA** means the Montana Code Annotated.
- **Uniform Guidance** means 2 CFR Part 200 and 2 CFR Part 2205.
- **USC** means the United States Code.

Section One (I) Program Administration and Management

A	Organization and Program Capacity	Yes	No	N/A	Comments/Concise Description
1	Since the risk assessment, has the subrecipient retained key program or fiscal staff and systems to manage grant-funded activities (<i>i.e.</i> , little or no turnover)? <i>2 CFR 200.332(b)(3); AC Gen T&Cs III.A.1</i>				
2	Does the subrecipient maintain documentation (all records, including fiscal) of the grant application and award? <i>2 CFR 200.334, AC Gen T&Cs III.M.3</i>				
3	Does the subrecipient properly use the AmeriCorps Montana logo and acknowledge AmeriCorps with respect to their website, social media, service locations, service gear/clothing, MOUs/partnership agreements, and publications? <i>45 CFR § 2522.100; AC Gen T&Cs III.H.1, III.H.2, III.H.3, III.H.4, III.H.5, III.O.2</i>				
4	Does the subrecipient communicate staffing/program updates, substantial changes in program goals/objectives or member supervision, challenges, & good ideas to GOCS? <i>2 CFR 200.308; AC Gen T&Cs III.A.3, III.C; ASN T&Cs X.A, X.B</i>				
5	Does the subrecipient adequately ensure member safety? <i>ASN T&Cs XIV</i>				

Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area

For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter

B	Drug Free Workplace Act of 1988 <i>See 42 U.S. C. § 12644; 41 USC § 8103, et seq.; 2 CFR part 2245</i>	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient have and inform staff, members, and				

	volunteers of a Drug Free Workplace policy stating that manufacture, distribution, dispensing, and possession or use of controlled substances are prohibited and setting forth consequences for violation such as disciplinary action and/or referrals to treatment?				
2	Does the subrecipient have a drug-free awareness program to inform employees and members about the dangers of drug abuse in the workplace, the policy, and any available employee assistance programs?				
3	Does the subrecipient notify employees and members that they must notify the subrecipient within 5 days, and notify GOCS & AmeriCorps within 10 days, of any criminal drug statute conviction occurring in the workplace/service location?				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

C	Nondiscrimination	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient give public notice of nondiscrimination requirements by including information in program materials and by posting it? <i>45 CFR 2540.210(d), ASN Gen T&Cs III.M.1</i>				
2	Does the subrecipient notify stakeholders, including those with impaired vision or hearing, that grant operations and members are subject to nondiscrimination requirements, including but not limited to prohibitions of harassment based on protected categories? <i>42 U.S.C. § 12635; 45</i>				

	<i>CFR 2540.210; AC Gen T&Cs III.M, IV; AmeriCorps Program Civil Rights and Non-Harassment Policy</i>				
3	Does the subrecipient note an appropriate point of contact for filing a discrimination complaint? <i>45 CFR 2540.210(d)(2); AC Gen T&Cs IV; AmeriCorps Program Civil Rights and Non-Harassment Policy</i>				
4	Does the subrecipient provide meaningful access to their programs and activities by Limited English Proficient (LEP) persons? <i>67 Fed. Reg. 64604; AC Gen T&Cs III.M.2</i>				
5	Does the subrecipient have a process different from the grievance process to implement the member and volunteer discrimination complaint procedure at 45 CFR 1225, including: <ul style="list-style-type: none"> • time frames for pre-complaints and complaints; • the person who receives informal and formal complaints; • that legal representation is allowed; • freedom from reprisal; • the process including filing, review, decisions, corrective actions, and closeout? <i>45 CFR 1225</i>				
6	Based on information available to GOCS and/or AmeriCorps (e.g., non-confidential info), has the subrecipient timely decided and taken appropriate remedial action for any discrimination complaints?				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
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D	Reasonable Accommodation 29 <i>U.S.C. § 794, 42 U.S.C. § 12101 et seq.; 45 CFR 2522.100(h), 45 CFR 2524.40; ASN T&Cs IV.F</i>	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient ensure compliance with reasonable accommodation requirements?				
2	Do outreach and recruitment materials state that reasonable accommodations can be made for interviews and, if selected, service activities?				
3	Has the subrecipient received any reasonable accommodation requests for this grant year?				
4	Has the subrecipient documented action steps taken to meet any accommodations request(s) for this grant year?				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
Best practice is to develop an organizational policy addressing reasonable accommodation and post it online.					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

E	Non-supplantation, Non-duplication & Non-displacement	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient adequately ensure that funds are not used to supplant State/local funds or to duplicate services? <i>42 U.S.C. § 12637(a); 45 CFR 2540.100(a); ASN T&Cs V.A</i>				
2	Does the subrecipient adequately ensure that members do not displace a current position, or employee? <i>42 U.S.C. § 12637(b); 45 CFR 2540.100(f); ASN T&Cs V.A</i>				
3	Has the subrecipient consulted with relevant local labor organizations? <i>45 CFR 2540.100(d)</i>				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or					

inclusion in summary letter

F	Member Recruitment and Enrollment	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient post all member listings/position descriptions as Service Opportunity Listings in the My AmeriCorps Portal? <i>ASN T&Cs IV.A</i>				
2	Does the subrecipient have a member recruitment plan and process including active promotion of service opportunities to ensure meeting recruitment targets in accordance with mechanisms recommended by GOCS? <i>45 CFR 2550.80(h); MT Program Director's Guide: AmeriCorps Recruitment</i>				
3	Does the subrecipient recruit with a goal of having a diverse corps, including people with disabilities and people from communities served? <i>Notice of Funding Opportunity; MT Program Director's Guide: AmeriCorps Recruitment</i>				
4	Do recruitment materials identify the program as AmeriCorps? <i>AC Gen T&Cs III.H</i>				
5	Does the subrecipient adequately ensure that members are selected in a fair and non-discriminatory manner? <i>45 CFR §2522.210(a), 2522.100(g) & 2540.210, 2540.203, AC. V</i>				
6	Does the subrecipient have and enforce an adequate policy or procedure to enroll members into the My AmeriCorps portal within 8 days? <i>ASN T&C IV.C</i>				
7	Before enrollment, does the subrecipient review eligibility documentation, including age, proof of citizenship/allowable legal status, and member certification of high school diploma/HSET/GED or				

intent to earn one before using education award? <i>45 CFR 2522.200; ASN T&C IV.C, IX.B</i>				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area				
Note any evidence of falsely enrolling service members or individuals misusing authority or their position for personal financial gain or the gain of a close family member or business associate and, if there is any evidence, a corrective action plan.				
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter				

G	Member Service Agreement	Yes	No	N/A	Comments/Concise Description
1	Does the Service Agreement include a position description that describes the position as service? <i>ASN T&C V.A, V.B.1</i>				
2	Does the Service Agreement state the term of service, hours and amount of Education Award? <i>ASN T&C V.B.2, V.B.3</i>				
3	Does the Service Agreement contain standards of conduct? <i>ASN T&C V.B.4</i>				
4	Does the Service Agreement address prohibited activities listed in 45 CFR 2520.65? <i>ASN T&C V.B.4, V.C?</i>				
5	Does the Service Agreement discuss non-duplication and non-displacement as set forth in 45 CFR 2540.100(e)-(f), <i>ASN T&C V.B.6</i>				
6	Does the Service Agreement discuss allowable and unallowable fundraising as provided in 45 CFR 2540.40 and 2540.45? <i>ASN T&C V.B.7</i>				
7	Does the Service Agreement discuss compliance with the Drug Free Workplace Act (41 U.S.C § 701 <i>et seq.</i>)? <i>ASN T&C V.B.8</i>				
8	Does the Service Agreement state civil rights requirements, complaint procedures, and rights of beneficiaries? <i>ASN T&C V.B.9</i>				
9	Does the Service Agreement discuss				

	suspension and termination rules? <i>ASN T&C V.B.10</i>				
10	Does the Service Agreement discuss release for cause and release for compelling personal circumstances as set forth in 45 CFR § 2522.230? <i>ASN T&C V.B.11</i>				
11	Does the Service Agreement include a grievance procedure as set forth in 45 CFR § 2540.230? <i>ASN T&C V.B.12</i>				
12	Does the Service Agreement state program specific requirements, terms, conditions, and benefits of serving? <i>ASN T&C V.B.13</i>				
13	Have members signed the Service Agreement on or before the first day of service? <i>ASN T&C V.B</i>				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
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H	Grievance Procedure – General (Not Member/Volunteer Discrimination Complaint)	Yes	No	N/A	Comments/Concise Description
1	Does the grievance procedure allow for Alternative Dispute Resolution (ADR) as an option before filing a grievance? <i>45 CFR 2540.230(a)</i>				
2	For matters unresolved through ADR, is there a formal grievance process? <i>45 CFR 2540.230(b), ASN T&C V.B.12</i>				
3	If grievances were filed during the program year, were all adequately and timely resolved (e.g., decision no later than 60 calendar days after grievance filed)? <i>45 CFR 2540.230(c)</i>				
4	Does the procedure provide that a party who receives no decision on a grievance within 60 days after filing or who receives an adverse decision may submit the grievance to binding arbitration? <i>45 CFR 2540.230(d)</i>				

5	Does the procedure address evenly splitting costs of binding arbitration? <i>45 CFR 2540.230(d)(3)</i>				
6	Does the grievance procedure allow members to contest a program's ruling of unsatisfactory performance by filing a grievance? <i>45 CFR 2522.220(e)</i>				
7	Has the subrecipient brought any grievance alleging fraud or criminal activity to the attention of the AmeriCorps Inspector General? <i>45 CFR 2540.230</i>				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
Best practices: Include the grievance process in the member handbook, ensure the grievance policy covers all parties (e.g., the public, service locations, applicants), list potential remedies including those in 45 CFR 2540.230(f), and post the grievance policy online.					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

I	Service Location performance	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient execute MOUs with service locations that explicitly state the program is AmeriCorps and adequately set forth AmeriCorps requirements and site requirements for supporting the member(s) and program (e.g., regular and consistent supervision, data sharing, supplies for member)? <i>AC Gen T&Cs H.1</i>				
2	Does the subrecipient assign each member to one primary service location within 8 days of the member starting a term of service? <i>ASN T&Cs IV.G</i>				
3	If a member is serving at more than one service location, does the subrecipient adequately ensure the member and site supervisors understand their respective roles and requirements (e.g., position descriptions for both, two supervisor NSCHCs if they are				

	included in a line-item budget, scheduling, which supervisor(s) will approve member activities and time off, discipline)?				
4	Does the subrecipient have an adequate protocol (e.g., policy, risk assessment, calendar) for monitoring service sites?				
5	Does the subrecipient adequately document service location monitoring activities?				
6	Does the subrecipient make reasonable efforts to ensure service location partners follow AmeriCorps, state, and federal policies?				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
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J	In Service & Site Supervisors	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient have adequate protocols for ensuring member service activities align with the position description? <i>ASN T&Cs V.A</i>				
2	Does the subrecipient have adequate protocols to ensure members are not engaging in prohibited activities? <i>45 CFR 2520.40, 2540.45, 2520.65; ASN T&Cs V.B.5</i>				
3	Does the subrecipient adequately ensure that team leaders are not supervising other members or engaging in unallowed team leader activities? <i>ASN T&Cs V.F</i>				
4	Is there a schedule for completing midterm (if applicable) and end of service performance reviews? <i>ASN T&Cs V.G</i>				
5	Does the subrecipient have adequate protocols for recruiting, selecting, training, and				

	maintaining sites and designated site supervisors to provide regular and consistent support and supervision for each member? <i>ASN T&Cs V.D</i>				
6	Does site supervisor training include review of the AmeriCorps prohibited activities? <i>45 CFR 2520.65; ASN T&Cs V.C, V.D</i>				
7	Has the subrecipient reported any serious injuries or fatalities to GOCS? <i>ASN T&Cs V.J</i>				
8	Does the subrecipient ban text messaging/use of cell phones while operating a vehicle on official business in accordance with <i>Executive Order 13513</i> ?				
Overall notes (if any), including best practices, strengths, how GOCS can provide support in this area					
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K	Member Service Hours	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient adequately ensure that time and attendance recordkeeping is conducted by the AmeriCorps member’s supervisor using a system compliant with 2 CFR 200.430? <i>ASN T&Cs V.H</i>				
2	Does the subrecipient track hours to ensure that members will complete required service hours (e.g., maintaining time sheets current within 30 days, communicating with member and site supervisor if member is behind)? <i>2 CFR 200.303 (internal controls)</i>				
3	Does the subrecipient ensure that members do not exceed 20% of term hours in the training/member development category? <i>45 CFR 2520.50</i>				
4	Does the subrecipient ensure that members do not commit more than				

	10% of their service term toward fundraising? <i>45 CFR 2520.45</i>				
5	Does the subrecipient have a policy allowing members to serve on a jury without penalty? <i>ASN T&C V.I</i>				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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L	Member Training and Documentation <i>Notice of Funding Opportunity, Approved grant application, MT Program Director’s Guide: Grant Funds and Service Activities; Member Development</i>	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient have an adequate written member training plan?				
2	Does the subrecipient provide member training informing the member that the program is part of AmeriCorps and including AmeriCorps and program history, mission, benefits, timekeeping, and service activities? <i>AC Gen T&Cs H.1, ASN T&Cs III.A</i>				
3	Are trainings held in accessible locations?				
4	Do trainings follow an agenda?				
5	Does the subrecipient maintain sign-in sheet(s) for all training events including orientation, in-service, and end-of-service?				
6	Do sign-in sheets adequately document events and activities by including information such as date, time, location, name of training, and attendees?				
7	Are members trained on AmeriCorps prohibited activities? <i>45 CFR 2520.65</i>				
Overall notes (if any), including best practices and how GOCS can provide support in this area					

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M	Performance Data & Evaluation <i>45 CFR 2522 Subpart E, funding notices, approved grant application, and progress report instructions</i>	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient adequately collect and aggregate data for performance measure and performance data element reporting (items in progress report)?				
2	Does the subrecipient have and follow a written policy, procedure, plan, or process for collecting, reviewing, and verifying data?				
3	Does the subrecipient use consistent data collection methods over time and across sites?				
4	Does the subrecipient measure what it intended, as stated in approved performance measures?				
5	Is data centrally reported to facilitate quality control, monitoring, and inclusion in the progress report?				
6	Is data accuracy adequately verified (e.g., data provider certifying accuracy, objective review by non-collector)?				
7	If performance measure targets have not been met, has the subrecipient developed an adequate corrective action plan to achieve or adjust targets? <i>45 CFR 2522.630</i>				
8	If the program has operated longer than 3 years, has the subrecipient conducted an evaluation in this three-year cycle? <i>45 CFR §§ 2522.100(p), 2522.500 through 2522.560; 2522.700 through 2522.820; ASN T&C XVIII</i>				

9	If not currently conducting an evaluation, does the subrecipient have an adequate plan for its next evaluation? <i>ASN T&C XVIII</i>				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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N	Member Exit	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient have an adequate process for ensuring that all members have an end of service performance review? <i>ASN T&Cs V.G</i>				
2	Do members complete the exit form in the My AmeriCorps Portal with staff completing and submitting the exit form within 30 days? <i>ASN T&Cs IV.H, IV.I</i>				
3	Does the subrecipient have an adequate system to document exits for compelling personal circumstances, for cause, or when a member cannot be located? <i>45 CFR 2522.230; ASN T&Cs VII</i>				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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O	Access to Records	Yes	No	N/A	Comments/Concise Description
1	Are files, including general, medical, NSCHCs, and other sensitive personally identifying information adequately secured? <i>ASN T&Cs IX.A</i>				
2	Is access to member files limited to appropriate subrecipient staff, GOCS staff and AmeriCorps officials? <i>ASN T&Cs IX.C</i>				
3	Are medical files kept separately from general member files, per HIPAA and ADA requirements?				
4	Is access to medical files limited to appropriate subrecipient staff?				

5	Does the subrecipient have and follow a records retention policy/procedure ensuring compliance with the subaward agreement between the organization and GOCS (8 years)? <i>AmeriCorps Service Contract 4.3</i>				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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P	Health and Childcare Benefits 45 CFR 2522.250, ASN T&C VIII(D) & (F)	Yes	No	N/A	Comments/Concise Description
1	If the subrecipient provides health care benefits for full-time members and those serving in a full-time capacity, do the benefits meet AmeriCorps requirements? <i>ASN T&Cs VIII.D</i>				
2	Has the subrecipient adequately referred members to the childcare benefit? <i>ASN T&Cs VIII.F, VIII.G</i>				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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Q	National Service Criminal History and Other Checks 45 CFR 2540.200 through 45 CFR 2540.207; ASN T&Cs IX.D	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient have a policy/procedure or otherwise ensure the adequacy of its internal process for conducting NSCHCs, in accordance with NSCHC guidance on the AmeriCorps.gov website?				
2	Are all cells of the Simple Log filled out, either with data, N/A or an explanatory comment as applicable, and do the dates align with vendor and other source documentation?				
3	Does the subrecipient or any of its service locations conduct a suitability				

	check in addition to a NSCHC?				
4	Are all NSCHCs adjudicated before the member's start date as reflected in vendor reports or outside the system(s)?				
5	Is there a NSCHC consent form signed by the candidate agreeing to undergo checks, including the statement that selection for the position is contingent upon results?				
6	Does the subrecipient ensure that applicants are not assuming the cost of performing a NSCHC?				
7	Does the subrecipient provide opportunities for the applicant to review and challenge the factual accuracy of a result?				
8	Has the subrecipient conducted new NSCHCs for consecutively-serving members or employees with a break in service or employment of greater than 180 calendar days?				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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R	Vendor Checks (for programs using AmeriCorps approved vendors, skip to Section S if not using vendors)				
	Truescreen (Using AC Approved Vendors Guide)	Yes	No	N/A	Comments/Concise Description
1	CNCS Monitoring Report: Are Adjudicated Results (Pass/Review) entered?				
2	If Adjudicated Results are in Review status, does the subrecipient have supplemental documentation verifying an eligibility determination was made outside of Truescreen?				
	Fieldprint (Using AC Approved Vendors Guide)	Yes	No	N/A	Comments/Concise Description
3	Are checks run <i>only</i> on individuals required to comply with NSCHC?				
4	If the Status (Fieldprint's adjudication recommendation) is "Not Cleared" in				

	the TCN Status Report, does the subrecipient have documentation confirming there are no disqualifying convictions?				
5	TCN Status Report: Are Grantee Adjudication Decisions (Pass/Fail) entered?				
6	If Grantee Adjudication Decision is blank in the TCN Status Report, does the subrecipient have supplemental documentation verifying an eligibility determination was made outside of Fieldprint?				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
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S	Non-Vendor Checks (skip if only using approved vendors) NSOPW and State Repositories Manual				
	NSOPW	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient keep a copy of NSOPW results on file?				
2	Do the names run through the www.NSOPW.gov match the applicant identification documents?				
3	Are all states included in NSOPW search results?				
4	If there are individuals on NSOPW results with the same name as the applicant, does the subrecipient adequately document that the candidate is not one of the results?				
	Montana State Checks	Yes	No	N/A	Comments/Concise Description
5	Does the subrecipient use the Montana State Repository?				
6	If results contain hits, does the subrecipient adequately document their review and decision to enroll the member?				
	State of Residence Checks	Yes	No	N/A	Comments/Concise Description
7	Does the subrecipient adequately determine the applicant state of residence (e.g., per				

	policy/procedure)?				
8	Does the subrecipient use the approved State Repository?				
9	If results contain hits, does the subrecipient adequately document the review and decision to enroll the member?				
	FBI Checks	Yes	No	N/A	Comments/Concise Description
10	Does the subrecipient use the appropriate repository to run the FBI check?				
11	If results contain hits, how does the subrecipient document their review and decision to enroll the member?				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

Programmatic Summary including next steps, clarifications, corrective actions, recommendations

Section Two (II) *Fiscal Review*

This is NOT an audit. This is a compliance review of subrecipient and grant-related financial systems, policies, records, and documentation to help assess adequacy and the subrecipient’s compliance with grant provisions and federal requirements. Complete the comment sections to explain how the subrecipient is meeting a requirement, or why the subrecipient has not met the requirement. Leadership staff, financial, and program officials should be available for discussion, as needed.

A	Accounting System & Management	Yes	No	N/A	Comments/Concise Description
1	Is documentation of the most recent monitoring report, findings, and corrective actions on file at the subrecipient organization?				
2	Does the subrecipient have and follow adequate policies and procedures about how the organization receives, expends, and accounts for AmeriCorps and non-AmeriCorps resources? <i>2 CFR Part 200; AC Gen T&Cs III.B.1</i>				
3	Does the subrecipient have a current written methodology or means of describing how direct costs are allocated on a reasonable basis (not budgeted percentages)? <i>2 CFR 200.405, 2 CFR 200.413</i>				
4	Is the subrecipient clear on which accounting system it uses (<i>accrual, cash</i>)? <i>See 2 CFR 200.302</i>				
5	Does the Chart of Accounts easily identify the AmeriCorps program and its funding sources (AmeriCorps grant versus other funding)? <i>2 CFR 200.302</i>				
6	Are tax and insurance requirements in compliance, such as general liability, FICA, income tax, and worker’s comp? <i>ASN T&Cs VIII.C</i>				
7	Are member living allowances appropriately disbursed in regular increments (e.g., same amount each time regardless of hours served)? <i>ASN T&Cs VIII.A</i>				
8	Do accounting records reconcile to the Periodic Expense Reports				

	(PERs) submitted and approved, including what is charged to the AmeriCorps grant and to other sources? (N/A fixed)				
9	Does the subrecipient claim in-kind match on the grant? <i>2 CFR 200.306</i> <ul style="list-style-type: none"> If no, comment on the type of match used and how it is tracked. If yes, comment on how in-kind contributions are recorded in the accounting system for the project and/or by other tools. 				
10	If the subrecipient claims in-kind match, does the documentation of in-kind match include each of the following? <ul style="list-style-type: none"> Name of donor and date of contribution? Description the contribution? Value of the contribution? Clear language that the contribution is for the AmeriCorps project? Signature of the donor? Statement that donor verifies funds are not from other Federal sources (<i>unless authorized by law</i>) <i>2 CFR 200.306; 45 CFR 2521.45</i>				
11	If the subrecipient contracted with a consultant or other professional, is the payment adequately documented in terms of purpose, being reflected on ledger, contract/invoice, and staff approval? <i>2 CFR 200.459</i>				
12	Does the subrecipient adequately ensure that program income is expended within the grant period, or timely report any excess program income so that AmeriCorps can determine disposition of it? <i>2 CFR 200.307</i>				
13	Does the subrecipient have an inventory system for equipment				

	purchased by the grant? 2 CFR 200.439 defines threshold value of equipment; 2 CFR 200.313				
14	If the subrecipient maintains petty cash related to the AmeriCorps grant, does the organization adequately document check reimbursements and cancellation of petty cash receipts?				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

B	Indirect Costs	Yes	No	N/A	Comments/Concise Description
1	If the approved budget includes indirect costs, does the subrecipient adequately ensure that indirect costs are not also included as direct costs? 2 CFR 200.313, 2 CFR 200.414, 2 CFR 200.416, 2 CFR 200.418				
2	Does the subrecipient adequately ensure it is not exceeding the 5% cap on the AmeriCorps share of indirect costs? 45 CFR 2510.20 & 2521.95				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

C	Internal Controls <i>2 CFR 200.303 (referencing COSO Internal Control Integrated Framework)</i>	Yes	No	N/A	Comments/Concise Description
1	Does the subrecipient adequately ensure segregation of duties?				
2	Is there an organization chart showing placement of individuals responsible for financial and programmatic operations?				
3	Does the subrecipient have sufficient internal controls in place				

	to delegate authority and identify staff responsibilities?				
4	Have receipts/vouchers/source documents for each purchase or expenditure been signed/approved by person(s) authorized to do so?				
5	Are staff travel forms signed by the traveler and approved by supervisor?				
6	Is a list of authorized signers for checks (not the GOCS authorized signers list) maintained & current, and does the organization adequately ensure that signers are available to sign checks or approve EFT payments?				
7	<p>Does the subrecipient comply with Standards for Documentation of Personnel Expenses (e.g., Timekeeping) by ensuring that staff timesheets:</p> <ul style="list-style-type: none"> • Are supported by a system of internal control that provides reasonable assurance that charges are allowable, accurate, and properly allocated; • Are incorporated into the official records of the organization; • Reasonably reflect of the total activity for which the employee is compensated; • Comply with the organization's accounting policies and practices; and • If employee is billed less than 100% to grant, reflect that the salary/wages are allocated to specific activities or cost objectives? <p><i>2 CFR 200.413(c), 2 CFR 200.416, 2 CFR 200.430, 2 CFR 200.431</i></p>				
8	Does the subrecipient have documented procurement				

	<p>procedures including the following:</p> <ul style="list-style-type: none"> Standards of conduct including conflicts of interest and disciplinary actions for violations; Delineation of purchase thresholds; Single source provisions; Necessary affirmative steps to ensure minority businesses, women’s business enterprises, and labor surplus area firms are used when possible? <p>2 CFR 200.317 through 2 CFR 200.327</p>				
9	<p>Does the subrecipient have a written policy or procedure or otherwise ensure compliance with match requirements in 2 CFR 200.306 addressing:</p> <ul style="list-style-type: none"> How match is tracked and reported; A requirement that match be non-federal or, if federal, approved by the funding federal agency; and How in-kind donations are valued and recorded at fair market value? 				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					

D	Fixed Award Only ASN T&C VII.A, X.E, XI.C, XI.G, XVII, XIII; AmeriCorps Fixed Amount Grant Financial and Administrative Process Guide	Yes	No	N/A	Comments/Concise Description
1	Does what is described in the grant as Source of Match align with what is actually being spent?				
2	Is the Fixed Award grant type functioning well for the				

	subrecipient overall?				
3	Can the subrecipient cover cash flow prior to reimbursement on the Fixed Award?				
4	Does the subrecipient adequately verify member hours?				
5	Do member hours align with PER/RFR?				
Overall notes (if any), including best practices and how GOCS can provide support in this area					
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter					
<u>Fiscal Summary including next steps, clarifications, corrective actions, recommendations</u>					

III. Sampling

A. Fiscal Sampling, line-item budget only.

Review one or more PERs and select transaction samples. Document review below or in Fiscal Monitoring Sample Analysis Excel sheet. 2 CFR 200.420 through 2 CFR 200.476

Item	Amount	Charged to?	Supporting documentation complete?	In approved AmeriCorps budget?	Remarks?

B. Staff Timesheet Review

Employee Name	Time period	Funding Sources Used		
<i>Monitor Observations - Timesheets</i>		Yes	No	Observations
Do the timesheets substantiate expenditures charged to AmeriCorps?				
Are timesheets signed and dated by an appropriate supervisor or designated authority?				
Is there evidence that any staff time spent fundraising is not charged to the AmeriCorps grant, or only charged with prior written approval from AmeriCorps or charged as an indirect cost? 45 CFR 2520.60; 2 CFR 200.442; 2 CFR 200.460				

C. Travel Vouchers

Employee or Member Name	Reason for Travel	Payment Method & Amount	Funding Code
<i>Monitor Observations- Travel Expenditures</i>	Yes	No	Observations
Do the travel expenditures reviewed appear allowable?			
Is the travel included in the approved grant budget?			

Is the documentation (e.g., voucher) signed/certified by the employee or member?			
Is the documentation (e.g., voucher) approved by a supervisor or other authorized person?			
Does the documentation include expense types and amounts, mileage (if applicable), and dates of travel?			
Are travel costs paid in accordance with the organization's written travel policies and procedures?			
Does the supporting documentation appear adequate, including appropriate project-related justification for travel costs incurred?			
If GOCS reimbursed the travel, were non-grant funds used initially?			

Overall notes (if any), including best practices and how GOCS can provide support in this area
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter

IV. Member File Review Sheet

	Member Name				
	MSA Start Date		eGrants Enrollment Date		
	MSA Exit Date		eGrants Exit Date		
	Member Service Agreement (MSA) <i>ASN T&Cs V.B</i>	Yes	No	N/A	Comment
1	Does the MSA contain a position description?				
2	Does the MSA set forth the correct number of service hours and any other requirements necessary to successfully complete the term of service and be eligible for an education award?				
3	Does the MSA state the correct amount of the education award being offered for successful completion of the term of service in which the individual is enrolling?				
4	Does the MSA set forth standards of conduct?				
5	Does the MSA list prohibited activities, including those in 45 CFR § 2520.65?				
6	Does the MSA include the text of 45 CFR § 2520.100(e)-(f) about nonduplication and displacement?				
7	Does the MSA include the text of 45 CFR §§ 2520.40 and 2520.45 re fundraising?				
8	Does the MSA include requirements under the Drug-Free Workplace Act?				
9	Does the MSA include civil rights requirements, complaint procedures, and rights of beneficiaries?				
10	Does the MSA include suspension and termination rules?				
11	Does the MSA state the specific circumstances under which a member may be released for cause?				
12	Does the MSA include grievance procedures?				
13	Does the MSA list any other requirements established by GOCS or the program?				
14	Is the Member Service Agreement signed and dated before or on the start date by the member and, if applicable, a parent/guardian?				

15	Are all activities in the members' position description allowable?				
	Enrollment, service hours, and exit See <i>ASN T&Cs IV</i>	Yes	No	N/A	Comment
16	Was the 8-day enrollment requirement met?				
17	Does the date of first hour served match the MSA and eGrants start dates?				
18	Was the member exited within 30 days after term?				
	Eligibility <i>ASN T&Cs, 45 CFR 2522.910</i>	Yes	No	N/A	Comment
19	Is the current application on file?				
20	Is the member at least 17 years old (unless program is listed in 45 CFR 2522.110(b)(3) or (g))?				
21	If the member is under 18 years old, is parental/guardian consent in writing?				
22	If not done in the AmeriCorps member portal, is proof of citizenship and certification of a high school diploma (or exception) on file or documented as verified by program staff? <i>ASN T&C IX.B</i>				
23	If members are engaged in tutoring, does the program ensure the member meets qualification requirements in 45 CFR § 2522.900 et seq.?				
	Member onboarding	Yes	No	N/A	Comment
24	Is there a signed W-4 tax form for this member (if member receives a living allowance)? <i>ASN T&Cs VIII.C.3</i>				
25	Does the file contain a signed photo release? <i>ASN T&Cs IX.C</i>				
26	Is the member's acceptance or denial of healthcare benefits documented? <i>ASN T&C VIII.D</i>				
27	If the member is using the childcare benefit, is there eligibility documentation?				
	Member Timesheets	Yes	No	N/A	Comment
28	Are timesheets signed and dated by the member and a designated site supervisor?				
29	Do timesheets match the hours reported on the program tracking tool?				
30	Are monthly and cumulative hours appropriately tracked?				
31	Are fundraising hours no more than 10%				

	of the total hours?				
32	Are training/member development no more than 20% of the total hours?				
33	From the timesheet descriptions, are the member's activities allowable?				
34	From the timesheet descriptions, do the member's activities align with the approved grant?				
	Member Midterm Performance Review (if applicable) ASN T&Cs V.G	Yes	No	N/A	Comment
35	If applicable, has a midterm performance review been scheduled or conducted with the member?				
	Member Change of Status or Term ASN T&Cs IV.D, VI.C, VIII.E	Yes	No	N/A	Comment
36	If the member's term of service changed, is there adequate documentation in the file, including GOCS approval?				
37	If the term of service changed, is the change of status date in the file consistent with eGrants?				
38	If the term of service changed, was the change of status documented within 30 days?				
39	If the member has been suspended and/or reinstated, is there adequate documentation in the file?				
	Member Exit & End of Service Review (completed terms only) ASN T&Cs V.G	Yes	No	N/A	Comment
40	Do the members' total hours on the exit form in eGrants match the total in the file?				
41	Has an end of service performance review been completed?				
42	Does the performance review list the number of hours completed?				
43	Does the performance review document if the member has satisfactorily completed program requirements and any performance criteria that were clearly communicated at the beginning of the term?				
44	If the member exited early with a prorated Education Award, is there adequate documentation of compelling personal circumstances?				
	Comments re best practices, technical assistance provided, recommendations, and strengths				

	Best practices include maintaining timesheets current within 30 days, including hours served in mid-term performance review, requiring both the member and supervisor to sign performance reviews.

Overall notes (if any), including best practices and how GOCS can provide support in this area
For GOCS use only: items in this area (identified by this tool or in pre-monitoring) for follow-up and/or inclusion in summary letter

V. AmeriCorps Member Interview

	AmeriCorps Member Interview questions	Response
1	Name(s) & service locations of member(s) interviewed	
2	Service: What is a typical day like?	
3	Based on the position description and interview, is this what you expected? How or how not?	
4	What are the greatest strengths of your program and service site?	
5	Have you been involved with National Days of Service? <i>MLK Jr., AmeriCorps Week, 9/11 Day, any others</i>	
6	If yes, how were you involved?	
7	Did you attend an orientation?	
8	If yes, what information was presented?	
9	What was the most useful/valuable part of the orientation?	
10	Is there anything you wish was covered in the orientation training that was not presented?	
11	Do you receive in-service training to support both your service activities and professional development?	
12	If yes, how often and what is an example of an in-service training topic?	
13	Is there anything else you would like to be trained on and, if so, what and why?	
14	Can you list a few AmeriCorps prohibited activities?	
15	Do you serve in a clerical role beyond your assigned project tasks at your service location? If yes, how much time per week?	
16	Do you fill in for staff when they are out sick or on personal leave?	
17	Do you feel supported by the AmeriCorps program, your service site, and the community where you serve? Please give examples of why or why not.	
18	How often do you have check-ins with your site supervisor? What are those check-in meetings like?	
19	Do you feel that you can discuss concerns with your site supervisor and program staff?	
20	Have you connected with other AmeriCorps members in your region?	
21	If you desire to be more connected, what can your program do to provide better support?	

22	How does the reporting process work? Timekeeping? Progress reports? Other?	
23	What could be done to improve program processes, the service site, the program overall?	
24	What accomplishment are you most proud of as an AmeriCorps member?	
25	What do you wish was different about your service?	
26	What has been the best part of serving with AmeriCorps?	
27	What are your plans for life after service?	
28	Is your program helping you plan for Life After AmeriCorps? If yes, how?	
29	Would you consider serving another term with this program? Why or why not?	
30	Would you consider serving with a different program? Why or why not?	
31	Anything else you would like me to know? <i>Thank you for your service to MT!</i>	

AmeriCorps Site Supervisor Interview

	AmeriCorps Site Supervisor Interview questions	Response
1	Name(s) & service locations of site supervisor(s) interviewed	
2	Service: What do members do in a typical day?	
3	Based on the agreement with the program, is hosting an AmeriCorps member what you expected? How or how not?	
4	How much time do you spend with members?	
5	How do you interact with the members?	
6	How is/are AmeriCorps member(s) making a difference in your organization and in the community?	
7	How could the impact of the AmeriCorps member(s) activities be enhanced?	
8	What are the greatest strengths of your program and service site?	
9	How are the AmeriCorps members at your organization involved with National Days of Service? (<i>MLK Jr., AmeriCorps Week, 9/11 Day, others</i>)	
10	How much training did the AmeriCorps members receive prior to joining your organization?	
11	Is there additional training that would help members be more successful?	
12	Did your site/organization provide the AmeriCorps member with additional and ongoing training OR provide resources for them to attend outside training events? If yes, please specify.	
13	As a site supervisor, have you received training from the program on hosting an AmeriCorps member? If yes, what are some of the training topics?	
14	Is there anything else you would like to be trained on? If yes, what?	
15	Can you list a few AmeriCorps prohibited activities?	
16	Do members serve in a clerical role in your organization beyond their assigned project duties?	
17	Do members fill in for an employee if they are out sick or on personal leave?	
18	As a host site, do you feel supported by the AmeriCorps program? Please give examples of why or why not.	
19	How often do you communicate with program staff?	
20	Have you connected with other AmeriCorps site supervisors in the region? If yes, briefly describe.	

21	If you desire to be more connected, what can your program do to provide better support?	
22	How does the reporting process work? Timekeeping? Progress reports? Other?	
23	How do the programs' performance measures align with your organization's mission? Do you report on the performance measures? If yes, how often do you submit data?	
24	How would you describe the progress toward meeting performance goals this year?	
25	How would your organization be different without AmeriCorps?	
26	What has been the best part of supervising an AmeriCorps member?	
27	Would you host an AmeriCorps member in the future? Why or why not?	
28	What do you wish was different about being a Site Supervisor?	
29	What are your suggestions for improving program processes, the service site, the program overall?	
30	What is your favorite part of the program?	
31	Anything else you would like me to know? <i>Thank you for serving as a site supervisor!</i>	