

# **State of Alabama**

**Governor's Office  
of  
Faith-Based & Community Initiatives**

## **Alabama State Service Commission and AmeriCorps State**



## **Policy and Procedure Manual**

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**Governor’s Office of Faith-Based and Community Initiatives  
(GFBCI)  
Alabama State Service Commission  
AmeriCorps State Programs**



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**Governor's Office of Faith-Based and Community Initiatives  
Alabama State Service Commission  
AmeriCorps State Programs**

**I. A History of Service**

AmeriCorps is a network of national service programs that engages more than 75,000 Americans each year in intensive service to meet critical needs in education, public safety, health, and the environment. AmeriCorps members serve through more than 2,000 nonprofits, public agencies, and faith-based organizations. They tutor and mentor youth, build affordable housing, teach computer skills, clean parks and streams, run after-school programs, and help communities respond to disasters.

Created in 1993, AmeriCorps is part of the Corporation for National and Community Service, which also oversees Senior Corps and Learn and Serve America. Together these programs engage more than 2 million Americans of all ages and backgrounds in service each year. More than three-quarters of AmeriCorps grant funding goes to Governor-appointed State Commissions, which in turn distribute and monitor grants to local nonprofits and agencies. The other quarter goes to national nonprofits that operate in more than one state. The organizations receiving grants are responsible for recruiting, selecting, and supervising AmeriCorps members. (Source: [www.americorps.gov](http://www.americorps.gov) )

**The Edward M. Kennedy Serve America Act Summary - Public Law 111-13, enacted April 21, 2009**

On March 18, 2009, the House of Representatives passed the Generations Invigorating Volunteerism and Education Act (H.R. 1388) (GIVE) by a vote of 321-105. On March 26, 2009, the Senate passed an amended version of H.R. 1388 by a vote of 79-19, renaming the bill "The Edward M. Kennedy Serve America Act." On March 31, 2009, the House of Representatives passed the Edward M. Kennedy Serve America Act by a vote of 275-149. On April 21, 2009, President Obama signed the bill into law.

The bill reauthorizes the Corporation for National and Community Service and its programs through 2014. The bill includes significant provisions advancing the Administration's goals for national service, including: A dramatic expansion of service opportunities for Americans of all ages, setting a path for increasing the number of AmeriCorps members to 250,000 by 2017. A Social Innovation Fund pilot program to provide seed money and scale up innovative and evidence-based programs that leverage private and foundation capital to meet major social challenges. Expanding eligibility for the Senior Companion and Foster Grandparent programs. Simplifying AmeriCorps program management, including through the availability of fixed amount grants. Increasing the Segal AmeriCorps Education Award. Strengthening agency management to support expansion. H.R. 1388 adds language in the overall purpose statement to recognize social entrepreneurs,

increase public and private investment in nonprofits, leverage Federal investments, expand service learning, coordinate citizen service in emergencies or disasters, increase service opportunities for retiring professionals, encourage continued service of national service alums, support colleges that engage students in community service, encourage service by individuals age 55 and older, expand the participation of veterans in national service, and focus national service on education, energy conservation, and improving the health status of and economic opportunity for economically disadvantaged individuals.

H.R. 1388 directs the Corporation to develop a plan to increase AmeriCorps positions – including NCCC, VISTA, and AmeriCorps State and National positions – to 250,000 by fiscal year 2017, beginning with 88,000 positions in 2010, 115,000 in 2011, 140,000 in 2012, 170,000 in 2013, 200,000 in 2014, 210,000 in 2015, 235,000 in 2016, and 250,000 in 2017, while working towards achieving a goal of having at least 50% of the positions be full-time. Implementation of this plan is tied to the availability of appropriations, and takes into account the need to ensure quality of service opportunities.

## **II. Alabama AmeriCorps State**

AmeriCorps in Alabama: The Governor’s Office of Faith-Based and Community Initiatives (GFBCI) - the Alabama State Service Commission, “the Commission,” provides oversight and technical assistance to all AmeriCorps State funded programs in Alabama. The Commission is comprised of, between 16-25, gubernatorial appointed Commissioners who serve in staggered three year terms. All Alabama AmeriCorps programs adhere strictly to the AmeriCorps Provisions provided by the Corporation for National and Community Service (CNCS).

The Commission also serves in an advisory capacity to the State Citizen Corps Program, the Ready Alabama campaign, lead agency for the State Emergency Operation Plan: Support Annex H – Volunteer and Donations Management, the Governor’s Interagency Council on Homelessness, the Alabama High School Drop-Out Prevention Initiative and the Alabama Strengthening Communities project. ([www.ServeAlabama.gov](http://www.ServeAlabama.gov))

Administrative funds are awarded to the GFBCI/the Commission each calendar year for Administration, Program Development and Training, and Disability/Inclusion Funds. These funds support the operating expenses of the Commission and provide training funds for State programs and other national service providers. The Disability/Inclusion funds allow Commissions to provide resources including training, reasonable accommodations and other resources to ensure that all citizens who want to serve have access to the opportunity.

***The following policies and procedures are in accordance with state policy, federal policy and applicable statutes.***

## **A. Sub-Grantee Application, Review and Award Process**

### Application Process:

There are two types of AmeriCorps State awards administered by the GFBCI/the Commission.

- (1) The first type, the Competitive Award, is submitted by applicants to the GFBCI but is competitively reviewed with the standard Grant Application Review Process (GARP) on the national level by CNCS. These programs are generally more seasoned, innovative and have greater capacity to support a sustainable program. Awards are made for a three year period and are renewable each year based on program performance and availability of funds.
- (2) The second type, the Formula Award, is also submitted to CNCS by the GFBCI but is reviewed and approved at the State level by the Alabama State Service Commission. These programs are generally smaller and/or less seasoned grantees that need additional training and technical assistance to become competitive applicants in the future. Awards are made for a three year period and are renewable each year based on performance and availability of funds.

Generally, the GFBCI AmeriCorps State programs' grant cycle begins October 1<sup>st</sup> and ends September 30<sup>th</sup>. However, some programs begin their program year September 1<sup>st</sup> and end August 31<sup>st</sup>. There are two separate timelines established each year for the Competitive applicants and the Formula applicants. All applications must be submitted via eGrants as a sub-applicant of the Commission.

### **AmeriCorps State Planning Grants**

**Purpose:** The purpose of planning grants is to support the development of AmeriCorps programs so applicants are better prepared to compete for an AmeriCorps program grant in the following grant cycle. Planning grants may not be used to support AmeriCorps members. The planning year will be to develop a full application for an AmeriCorps State program and allowable activities will include; participation in Commission and CNCS trainings, development of outreach materials, policy and program forms.

**Eligibility:** AmeriCorps State and National Planning Grant applicants must not have previously received an AmeriCorps State or National grant.

Funding announcements will also be posted on the GFBCI web site and in the bi-weekly GFBCI "Loop."

## **AmeriCorps State Review and Pre-Award Process**

Formula Sub-grantees' applications are reviewed at the state level, which consists of a staff and peer review. Reviewers utilize the GFBCI standard AmeriCorps Application Review Form. Applications for both the competitive and formula Sub-grantees may be returned to applicants for final revisions based on the comments of the staff and peer review. Applicants are also required to submit a Pre-Award Financial Risk Assessment.

New and re-competing applicants are reviewed by both staff and peer reviewers using the standard GFBCI AmeriCorps Application Review Form. Continuation applications (programs in the 2<sup>nd</sup> and 3<sup>rd</sup> year of a funding cycle) are reviewed by staff using a modified review tool.

All funding recommendations are made from the State AmeriCorps staff to the GFBCI/the Commission for a final decision to 1.) Recommend Competitive sub-applications to be forwarded to CNCS and 2.) Approve funding of Formula sub-applications by the Commission. Final funding decisions for a competitively awarded grantee are made by CNCS.

The competitive grants are also staff and peer reviewed and ranked at the state level. The Commission must vote to approve sub-applications prior to the sub-applications being forwarded to CNCS to compete at the national level. If the vote does not occur at a regular Commission meeting, with a quorum present, the portfolio must be ratified at the next meeting of the Alabama State Service Commission.

The timeline for applications and application instructions will be e-mailed to the current sub-applicants and available for download from the GFBCI web site, and through the GFBCI bi-weekly listserv "the Loop." All new applicants must submit a letter of intent by the date indicated on the timeline prior to a full application being accepted for review. Formula Sub-grantees that are continuing a program in good standing must still submit a letter of intent that they are going to continue the program.

## **Peer Review**

Peer Reviewers are utilized for all funding competitions at the GFBCI. The number of peer reviewers for each competition are selected based on the number of applicants. Peer reviewers are selected based on their past experience either with national service, grants management, community-based and/or faith-based organizations, funding projects and any other applicable experience.

Due to the amount of time required to appropriately review and score each AmeriCorps application the number of reviewers is often limited. Reviewers are required to complete the GFBCI Conflict of Interest and Confidentiality Agreement each time they participate in a review process.

Peer reviewers are asked to participate in a review session that gives them the opportunity to discuss their scores and comments, and provide feedback to the GFBCI AmeriCorps State Program staff. While on-site participation is encouraged, reviewers are allowed to join the discussion via conference call when necessary. All scores and comments from both the peer and staff are collected after the review is complete. Comments are compiled and incorporated in the suggested reworks that are provided to the applicant. No applicant is removed from the process during the peer and staff review process.

### **Staff Review**

The Staff Review process is similar to the Peer Review process. In addition to the standard scoring tool, the staff also verifies that the application is complete, the Sub-grantees level of performance (if not a new applicant) is reviewed, the budget is analyzed by the Staff Accountant and the fiscal agent, and the pre-award financial risk assessment is reviewed.

The AmeriCorps State staff is also responsible for compiling the Peer and Staff comments and returning them to the applicant for rework when necessary. Neither the peer or staff reviewers have the authority to remove an application from the grant review process. All applications are forwarded to the Commission for final consideration.

### **Pre-Award Financial Risk Assessment**

Prior to a new organization receiving an AmeriCorps State award, the organization must complete a Pre-Award Financial Risk Assessment. Once received by the GFBCI the assessment is reviewed by the GFBCI Staff Accountant and the appropriate staff at the Alabama Department of Mental Health (GFBCI's fiscal agent). Findings are summarized and included in the packet presented to the GFBCI Commission with the final funding recommendations.

Other pre award assessments may be utilized at the discretion of the GFBCI AmeriCorps staff.

## **B. AmeriCorps State Award Process**

The Commission makes all funding decisions for AmeriCorps State Programs. (The Commission makes final recommendations to forward applications during the Competitive process and selects the final applicants in the Formula portfolio). Once the Commission approves a portfolio, either Formula or Competitive, it is forwarded to CNCS for final approval.

Once the Commission has met and voted on the final award amount and made any stipulations that must be addressed prior to the contract being issued, the AmeriCorps State staff negotiates the final conditions prior to the issuance of the contract.

Award letters and contracts are sent to each legal applicant a minimum of ten working days prior to the start of the program year. Contracts must be signed and returned to the GFBCI prior to the start of the program year.

### **C. Administration, Program Development and Training, and Disability Awards**

In addition to the program grants issued each year, the GFBCI receives a federal allocation of funds to support the AmeriCorps program. These funds are issued in three (3) grant awards from January 1<sup>st</sup> to December 31<sup>st</sup>. The funding includes administrative support funds to provide financial and programmatic oversight and technical assistance to the programs. This grant requires a 1:1 match from the state.

There is also a Program Development and Training (PDAT) grant that provides ongoing professional development and topic specific training for AmeriCorps program directors, members and other national service partners. The training is coordinated by the Governor's Office of Faith-Based and Community Initiatives.

The AmeriCorps Program and Training Officer coordinates all aspects of trainings including: determination of training need(s), selection of trainer(s), coordination of location, purchasing of necessary training materials and supplies and submission for payment to the Alabama Department of Mental Health (DMH) for services rendered. All trainings will include an evaluation that will be used to help plan for future trainings. The AmeriCorps Program and Training Officer also works to coordinate development and implementation of the State Service Plan.

The final grant is for outreach to individuals with disabilities as AmeriCorps members and for programs that work to support, promote service opportunities and raise awareness of individuals with disabilities. The Disability Coordinator works closely with other national service programs, and public and private stakeholders to raise awareness of individuals with disabilities and their participation in AmeriCorps and other service opportunities.

The Disability Coordinator works to ensure that all materials related to the GFBCI are accessible to individuals with disabilities. The Disability Coordinator will also work to coordinate development and implementation of the State Service Plan with the Program Officer.

### **D. State Service Plan**

In 2006, the State Service Plan replaced the Unified State Plan. Development and maintenance of the State Service Plan is the responsibility of the GFBCI/the Commission with input from the CNCS State Office and other stakeholders. This plan is updated annually.

The Serve America Act (SAA) specifies that the State Plan is subject to approval of the Governor. The SAA adds the requirement that the Plan must include measurable outcomes, authorizes the State Plan to serve as basis for considering waivers of administrative (non-statutory) requirements a State identifies as impeding efficiency of service programs and requires consultation with counties and municipal governments. CNCS makes inquiry to the State Service Plan in the annual Administrative grant but submission of a full copy to CNCS is not required.

The State Plan must also include a plan to engage persons aged 55 or older in civic engagement and service. In developing this plan, incorporate the current knowledge base on the economic impact of the roles of workers age 55 or older in the economy, the social impact of the roles of such workers in the community, and the health and social benefits of active engagement for adults age 55 or older.

This plan must include the following elements:

Recommendations for policies to increase service for adults age 55 or older, including how to best use such adults as sources of social capital, and how to utilize their skills and experience to address community needs;

Recommendations to [your state's agency on aging](#) on--a marketing outreach plan to businesses; and outreach to nonprofit organizations, the State educational agency, institutions of higher education, and other State agencies;

Recommendations for civic engagement and multigenerational activities, such as early childhood education and care, family literacy, and after school programs; respite services for adults age 55 or older and caregivers; and transitions for older adults age 55 or older to purposeful work in their post-career lives; and

Recommendations for encouraging the development of Encore service programs (i.e., programs enrolling a significant number of AmeriCorps members age 55 or older that takes advantage of the skills and experience that the members offer in the design and implementation of the program) in the State.

## **E. AmeriCorps State Training**

### **Training and Technical Assistance (new Subtitle J under the Serve America Act)**

In 2009 the Serve America Act, eliminated current law references to funding training and technical assistance in NCSA subtitle C and H, and DVSA, and authorizes a new subtitle J for Training and Technical Assistance for programs under the national service laws. This change in legislation

broadened the Commissions responsibilities for training and technical assistance from AmeriCorps State to also include Senior Corps and Learn and Serve.

Priority for training and technical assistance to be given to programs where services are needed most, where programs don't exist or don't meet community needs, in underserved rural or urban communities, and programs developing a service component that combines students, out-of school youth, and older adults as participants.

### **AmeriCorps State Required Trainings and Special Projects**

The Sub-grantee agrees to attend required trainings and special projects sponsored by the GFBCI and the Corporation for National and Community Service (hereinafter "the Corporation"). Such events may include, but are not limited to, start up training, quarterly program director's trainings, the AmeriCorps Launch (Opening Ceremonies), end of year graduation celebration and training workshops.

Programs are required to perform service projects and participate in the following national identity events: Reverend Dr. Martin Luther King Jr. Holiday, Make a Difference Day, September 11<sup>th</sup> National Day of Remembrance and National AmeriCorps Week. Programs are strongly recommended to train a minimum of 25% of their members each year in Community Emergency Response Training (CERT).

### **Training and Technical Assistance**

The AmeriCorps Sub-grantee implements a quality training program that strengthens members and results in:

- Members who are sufficiently prepared, trained and supported in their service.
- Increases member effectiveness and productivity through supporting member needs.
- Recognition for making a contribution to their community.

### **Training Plan Development**

The development of training plans for each program year begins during the fourth quarter of the current year for continuation and new programs.

Following is a timeline for the planning process:

#### **Summer**

- Send out Program Director's Assessment of Training and Program Needs
- Training Officer ensures that Module F has been completed for each program, *Program Development and Training Review*, Site Assessments on all Programs

## **Early Fall**

- Assessments are due back to the Training Officer
- Training Officer begins development of a Training Needs Assessment Chart for the upcoming year

When a Program Director's survey results are compiled on the Needs Assessment Chart, each program's training needs are logged, and preliminary training schedules are obtained from the programs. The Training Officer begins the process of creating the annual training calendar for the AmeriCorps State programs.

Training schedules obtained from the Program Directors are evaluated for:

1. Inclusive dates of CNCS special events
2. To determine if the programs have adequately scheduled the required training
3. Include program specific training

Priorities are then set from the Needs Assessment by comparing each Program Director's numerical value for each need along with the median numerical value for that same need. Next, several possible dates, times and locations are chosen for training. Program Directors are informed of the available training, dates, times and locations and asked to update their training schedules to include these trainings.

The calendar will act as a living document and be re-evaluated and revised as needed in order to adjust for such unforeseen incidents as an emergency or disaster that would impede any scheduled activities. Training and technical assistance is available throughout the program year as needed. Training may be in the form of onsite site trainings, webinars, conference calls, one on one trainings or during quarterly meetings.

Training and technical assistance is requested on the designated form and is reviewed to ensure requests are fulfilled within a reasonable time frame.

## **F. Disability/Inclusion**

The National and Community Service Trust Act, as amended, requires AmeriCorps programs to actively recruit individuals with disabilities. A qualified individual with a disability is a person who has the skill, experience, and education for a service position and can perform the essential functions of the position with or without reasonable accommodation. The selection process for AmeriCorps members must be based on the qualifications of the applicants and whether they can perform the essential program activities. If applicants with disabilities are qualified, then program directors are obligated by law to provide reasonable accommodations, when requested. Funds for reasonable accommodations may be available upon request from the GFBCI, State Service Commission.

## **G. Risk-Based Monitoring**

The GFBCI is responsible for all programmatic oversight of the AmeriCorps State programs. Files are maintained on each program (sub-award) at the GFBCI.

### **GFBCI Annual Risk Assessment**

#### **Development of the Sub-Grantee Monitoring Plan**

Prior to the start of the program year, each program is administered a risk-assessment (GFBCI Risk Assessment). From the risk assessment the GFBCI staff develops a monitoring plan for the program based on the level of risk and other factors as determined (e.g. new program). A letter is sent out to each program (Risk Assessment Response Letter) clearly stating the conclusions of the risk assessment and the individualized technical assistance plan for the program year.

#### **Site Visits**

The following outlines the procedures for implementation of the GFBCI Risk-Based Monitoring System:

- The monitoring system is set up in a Module format. Sub-grantees must satisfactorily meet all of the requirements reviewed in the monitoring system. If a Sub-grantee is found deficient in any area, a corrective plan must be submitted by the Sub-grantee in writing within 10 working days of receipt of the Site Visit Feedback Form from the Commission outlining the deficiencies.
  - Module A - Organizational Profile
  - Module B - Organization Member Information
  - Module C - Individual Member File Review
  - Module D - Financial Review
  - Module E - Performance Measure Review
  - Module F - Program Development and Training Review
  - Module G - Inclusion Review
  - Module H - Member Interview
- Site visits are conducted based on the risk assessment but the GFBCI monitoring schedule may be modified at any time during the program year to accommodate the changing needs of the Sub-grantee.
- Site visits are conducted annually but the Monitoring System is fully implemented over a three year cycle.
- Prior to a site visit the Sub-grantee receives written notification of the upcoming visit to include: date, time, location, and the Module to be reviewed (Site Visit Confirmation letter/e-mail). All of the GFBCI Risk-Based Monitoring Modules are available at the GFBCI website [www.ServeAlabama.gov](http://www.ServeAlabama.gov).
- After the completion of the visit, the GFBCI provides written feedback to the program with recommendations and a time frame for response to any findings made by the GFBCI.

## Desk Based Monitoring

The GFBCI regularly performs desk based monitoring of Sub-grantees. Sub-grantees may be monitored by submission of requested documents, audit of My AmeriCorps Portal, My Service Log (MSL) and other reporting formats utilized by AmeriCorps State programs. Feedback can be given to Sub-grantees in the form of an e-mail but must be maintained as a part of the permanent Sub-grantee file.

## Fiscal Monitoring

GFBCI implements financial procedures according to the OMB Circular Requirements, State of Alabama Requirements, CNCS Grant Provisions, and other grant provisions awarded to the agency.

Internal controls are implemented based on the State of Alabama Fiscal Policy and Procedures, State of Alabama Property Inventory Policy and GFBCI Internal Financial agency controls. AmeriCorps is a federally funded program and falls under the Uniform Administrative Requirements from the Office of Management and Budget.

There are two sets of Uniform Administrative Requirements:

1. Office of Management and Budget (OMB) Circular A-102, Grants and Cooperative Agreements with State and Local Governments. Note: School Districts and Indian tribal governments are also covered by A-102.
2. OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations.

In their current form, A-102 and A-110 each consist of two parts: the circular itself, and the accompanying common rule. The circular provides guidance to the federal agencies; the common rule provides the language the agencies are to adopt in their regulations.

Applicable OMB Circulars are listed below:

<b>Non-profit Organization</b>	<ul style="list-style-type: none"><li>• OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations</li><li>• OMB Circular A-122, Cost Principles for Nonprofit Organizations</li><li>• OMB Circular A-133, Audits of States, Local Governments, and Nonprofit Organizations</li></ul>
<b>Educational Institution</b>	<ul style="list-style-type: none"><li>• OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations</li><li>• OMB Circular A-21, Cost Principles for</li></ul>

	Educational Institutions <ul style="list-style-type: none"> <li>• OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations</li> </ul>
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For access to complete OMB Circulars and Cost Principles refer to:  
[http://www.whitehouse.gov/omb/circulars\\_default](http://www.whitehouse.gov/omb/circulars_default)

**Sub-Grantee Fiscal Monitoring**

If indicated by the risk assessment or other factors as determined by the Commission, a program will receive an annual review of Module D Financial Review as a part of their Individual Sub-Grantee Monitoring Plan. A program will receive at least one administration of Module D during their three-year funding cycle regardless of level of risk.

Annual schedules for Periodic Expense Reports (PERs) are located in the Sub-grantee’s contract, Attachment 1, from the GFBCI. Sub-grantees must be in accordance with all of the AmeriCorps Provisions, applicable OMB circulars and GFBCI policy as they relate to the financial management of the sub-award.

**H. American Recovery and Reinvestment Act (ARRA) Alabama AmeriCorps State**

(Section applicable for ARRA funded expansion projects only – concluded May 31, 2010)

**Overview**

The American Recovery and Reinvestment Act of 2009 (Recovery Act) was signed into law by President Obama on February 17th, 2009. It is an unprecedented effort to jumpstart our economy, create or save millions of jobs, and put a down payment on addressing long-neglected challenges so our country can thrive in the 21st century.

The Recovery Act is an extraordinary response to a crisis unlike any since the Great Depression, and includes measures to modernize our nation's infrastructure, enhance energy independence, expand educational opportunities, preserve and improve affordable health care, provide tax relief, and protect those in greatest need.

Only current AmeriCorps grantees are eligible for the funds. A current grantee is any of the following with an operational grant as of February 17, 2009: National Direct, National Professional Corps, Indian Tribes, and National EAP grantees; programs in states and territories without commissions; and State Commission Sub-grantees. ([www.CNS.gov](http://www.CNS.gov))

**Maintenance of Files**

All ARRA AmeriCorps State projects are maintained under distinct grant numbers and separate contracts. Separate files were established for each project.

**Separation of Funds:**

New cost codes were established at the state to maintain separation of funds. The State of Alabama established distinct accounts to receive ARRA funds.

Sub-grantee must also demonstrate that funds are maintained separately with a written cost allocation plan (can be an addendum to the existing cost allocation plan) for Recovery funds.

Copies of plan have been requested, reviewed and are maintained in the Sub-grantee file by the Commission.

**Additional ARRA Reporting Requirements**

In order to ensure transparency and accountability of funds, ARRA projects have additional reporting requirements.

Alabama State Department of Finance: Requires monthly reports and quarterly certification to the Governor prior to submission of each quarterly federal report. Web sites must be updated no later than one working day after the submission of the monthly report. State requirements also include the designation of a Compliance Officer from each department.

Federal Reporting: Submission of a quarterly 1512 report on [www.federalreporting.gov](http://www.federalreporting.gov)

**CNCS:** Quarterly Progress Reports in addition to the Federal Financial Report (FFR)

**ARRA “Recovery” Risk-Based Monitoring**

Existing Sub-grantees in good standing with the Commission were eligible to apply for one time ARRA funds to expand existing project and/or request match replacement funds for current projects. The Governor’s Office of Faith-Based and Community Initiatives (GFBCI) is responsible for programmatic oversight of the ARRA AmeriCorps State programs. Files are maintained on each program (sub-award) at the GFBCI.

**ARRA Risk Assessment**

ARRA funding was available only to existing Sub-grantees in good standing on the date the bill was signed by the President. This criteria determined eligibility for seeking ARRA funds.

### **ARRA Site Visits**

The Commission is implementing the existing risk based monitoring system for monitoring the ARRA projects. Emphasis is placed on Member File Review to ensure member eligibility. Due to the short duration of the project and the pre-existing criteria for eligibility all projects were determined to be low risk.

The following outlines the procedures for implementation of the GFBCI Risk-Based Monitoring System:

- The monitoring system is set up in a Module format. Sub-grantees must satisfactorily meet all of the requirements reviewed in the monitoring system. If a Sub-grantee is found deficient in any area, a corrective plan must be submitted by the Sub-grantee in writing within 10 working days of receipt of the Site Visit Feedback Form from the Commission outlining the deficiencies.
  - Module A - Organizational Profile
  - Module B - Organization Member Information
  - Module C - Individual Member File Review
  - Module D - Financial Review
  - Module E - Performance Measure Review
  - Module F - Program Development and Training Review
  - Module G - Inclusion Review
  - Module H - Member Interview
- Prior to a site visit the Sub-grantee receives written notification of the upcoming visit to include: date, time, location, and the Module to be reviewed (Site Visit Confirmation letter/e-mail). All of the GFBCI Risk-Based Monitoring Modules are available at the GFBCI website [www.ServeAlabama.gov](http://www.ServeAlabama.gov).
- After the completion of the visit, the GFBCI provides written feedback to the program with recommendations and a time frame for response to any findings made by the GFBCI.

### **ARRA Desk Based Monitoring**

The GFBCI regularly performs desk based monitoring of Sub-grantees. Sub-grantees may be monitored by submission of requested documents, audit of My AmeriCorps Portal© and My Service Log© utilized by AmeriCorps State programs. Feedback can be given to Sub-grantees in the form of an e-mail but must be maintained as a part of the permanent Sub-grantee file.

ARRA projects must complete monthly progress reports. These reports are utilized as a component of the ongoing monitoring of the project.

### **ARRA Fiscal Monitoring**

GFBCI implements financial procedures according to the OMB Circular Requirements, State of Alabama Requirements, CNCS Grant Provisions, and other grant provisions awarded to the agency.

Internal controls are implemented based on the State of Alabama Fiscal Policy and Procedures, State of Alabama Property Inventory Policy and GFBCI Internal Financial agency controls. AmeriCorps is a federally funded program and falls under the Uniform Administrative Requirements from the Office of Management and Budget.

There are two sets of Uniform Administrative Requirements:

1. Office of Management and Budget (OMB) Circular A-102, Grants and Cooperative Agreements with State and Local Governments. Note: School Districts and Indian tribal governments are also covered by A-102.
2. OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations.

In their current form, A-102 and A-110 each consist of two parts: the circular itself, and the accompanying common rule. The circular provides guidance to the federal agencies; the common rule provides the language the agencies are to adopt in their regulations.

Applicable OMB Circulars are listed below:

<b>Non-profit Organization</b>	<ul style="list-style-type: none"> <li>• OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations</li> <li>• OMB Circular A-122, Cost Principles for Nonprofit Organizations</li> <li>• OMB Circular A-133, Audits of States, Local Governments, and Nonprofit Organizations</li> </ul>
<b>Educational Institution</b>	<ul style="list-style-type: none"> <li>• OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations</li> <li>• OMB Circular A-21, Cost Principles for Educational Institutions</li> <li>• OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations</li> </ul>

For access to complete OMB Circulars and Cost Principles refer to:

[http://www.whitehouse.gov/omb/circulars\\_default](http://www.whitehouse.gov/omb/circulars_default)

### **ARRA Sub-Grantee Fiscal Monitoring**

A program will receive an annual review of Module D Financial Review as a part of their Individual Sub-Grantee Monitoring Plan.

Annual schedules for Periodic Expense Reports (PERs) are located in the Sub-grantees contract, Attachment 1 from the GFBCI. Sub-grantees must be

in accordance with all of the ARRA AmeriCorps Provisions, applicable OMB circulars and GFBCI policy as they relate to the financial management of the sub-award.

ARRA projects must request monthly reimbursement from the Commission. Periodic Expense Reports (PER), general ledgers and support documents are reviewed monthly for accuracy. Time sheets for any Sub-grantee staff paid by the Recovery grant must be submitted monthly as part of the reimbursement request package.

### **III. AmeriCorps State Program Policies and Procedures**

#### **A. Programmatic Policies and Procedures**

*The following policies and procedures are in accordance with state policy, federal policy and applicable statutes.*

##### **Other Provisions**

Failure to comply with any condition listed below or with the 2010 AmeriCorps® Provisions (*effective April 15, 2010*), will place an AmeriCorps Program in a state of non-compliance. No draw downs will be accepted while a program is in a state of non-compliance. A program will remain in a state of non-compliance until evidence to the contrary is provided to the GFBCI. Please refer to 2010 AmeriCorps® Provisions and Guidelines Section C. General Provision 19 (Legislative and Regulatory Authority) and General Provision 20 (Other Applicable Statutory and Administrative Provisions).

Sub-grantee agrees that all members must be enrolled in the Portal and My Service Log (MSL), no later than 14 days after the start of the program and/or their actual start date. Sub-grantee also agrees that all members are exited from the Portal and MSL, no later than 14 days from the last day of the program and/or their actual last day of service.

##### **Terms of Service**

An individual may receive the benefits for no more than four (4) terms of service in an AmeriCorps State and National program, regardless of whether those terms were served on a full-time, part-time, or reduced part-time basis. No individual may receive more than an amount equal to the aggregate value of two full-time education awards.

##### **Performance Reviews**

The grantee must conduct and keep a record of at least a midterm and end-of-term written evaluation of each member's performance for Full and Half-Time members and an end-of-term written evaluation for less than Half-time members. The end-of-term evaluation should focus on such factors as:

- a. Whether the member has completed the required number of hours;
- b. Whether the member has satisfactorily completed assignments; and

- c. Whether the member has met other performance criteria that were clearly communicated at the beginning of the term of service.

### **Program Changes Requiring Prior Written Approval From The GFBCI**

The Sub-grantee agrees to inform and obtain *written approval* of the GFBCI for the following:

1. Changes in the scope or goals of the program, whether or not they involve budgetary changes.
2. Changes in or extended absences of the Program Director, site supervisor, or any other key personnel of the program.
3. Substantial changes in the level of member supervision.
4. Entering into sub-grants or contracting out any AmeriCorps program activity funded by the grant and not specifically identified in the approved application and grant.
5. Changes in site location.
6. The Sub-grantee must notify the GFBCI in writing of extended absences of AmeriCorps members due to health or occupational reasons.
7. Programs must request slot conversions in writing to the GFBCI prior to making changes in the Portal. If the slot conversion requires a budget revision, the budget revision must be approved by the GFBCI prior to the completion of the slot conversion.

### **AmeriCorps Affiliation**

To establish a relationship between the Program and AmeriCorps, the Sub-grantee must use the phrase “The AmeriCorps National Service Network” or “an AmeriCorps® Program” and may use the slogan “Getting Things Done™” on such materials in accordance with the Corporation guidelines and requirements. The Sub-grantee must also include in all written materials such as letterheads, press releases, recruitment and graduation materials, brochures, etc., that is funded by the Governor’s Office of Faith-Based and Community Initiatives and the Corporation for National and Community Service.

### **My AmeriCorps Portal (Portal)**

In 2009, CNCS launched the My AmeriCorps Portal. The Portal website provides a one-stop-shop for AmeriCorps State and National, VISTA and NCCC members and alumni - presenting a wealth of information and self-

service capabilities, including access to the former AmeriCorps Online Payment System ([www.cns.gov](http://www.cns.gov)).

If a program chooses to utilize another application form, members still must be entered into the Portal.

The system allows for the following (lists are not inclusive of the system functionality):

Member Functions:

- ▶ Member Recruitment
- ▶ Member Application
- ▶ Member Exit
- ▶ Access to Education Award (upon successful completion of term)

Sub-Grantee Functions:

- ▶ Posting Service Opportunities
- ▶ Member Enrollment
- ▶ Member Exit
- ▶ Slot Conversions
- ▶ Service Site Information

Grantee Function:

- ▶ Global View of Sub-grantees
- ▶ Member Rosters
- ▶ All Functions Permitted to Sub-Grantee

**Service Location Profile**

The Sub-grantee must create and complete within 30 days after the program year start-up date a Service Location Profile in eGrants listing all the service sites for the program.

**My Service Log (MSL)**

In 2010, the GFBCI launched My Service Log (MSL) grant management system which replaced the federally supported Web-Based Reporting System (WBRS) and allows for various levels of access based on permissions. While the My AmeriCorps Portal assumed some of the functionality of the WBRS system it did not assume particular management tools beneficial to Sub-grantees and grantees.

MSL, a product of the Bonner Foundation, supports three critical management functions for the Alabama AmeriCorps State program:

1. Member Timekeeping – Allows members or sub grantee program staff to enter members hours as they serve to manage time and serve as an electronic back-up to the member service logs.

2. Financial Reporting - Sub-grantees will submit Federal Financial Reports (FFRs) and Periodic Expense Reports (PERs) to the GFBCI using the Due Date schedule Sub-grantee contract, Attachment I.
3. Progress Reports – The Sub-grantee is responsible for submitting Quarterly Progress Reports. The Sub-grantee is also responsible for conducting quarterly site visits with member placement sites. *Quarterly site visit notes are due at the same time as progress reports.*

Programs accessed as “low risk” will be required to submit semi-annual progress reports, due to the GFBCI on April 10, 2011 and October 10, 2011. (*Quarterly site visit notes should be attached to semi-annual progress reports*).

### **Reporting**

The Sub-grantee will promptly notify GFBCI in writing of:

1. Any legal judgment entered against it or its sub-grantee(s), if any, regarding malpractice or negligence.
2. Any legal judgment or governmental action against it which could affect the contract between the GFBCI and the Sub-grantee including, but not limited to, any action for professional negligence, fraud, violation of any law, or against any license, certification or accreditation held by the Sub-grantee or its sub-grantee(s), if any.
3. Any other matter that may impair the ability of the Sub-grantee to carry out the terms and conditions of the program contract.

### **Records Retention**

Documentation shall be readily available to representatives of appropriate federal agencies, GFBCI and the State Examiners of Public Accounts representatives upon their request. Said documentation shall be maintained in a form that will facilitate establishment of an audit trail in the event such items are audited, and for at least five (5) years beyond the final closeout certification from the date of the submission of the Final Financial Status Report (SF269A) and after receipt of final closeout certification from the GFBCI. The GFBCI will advise the Sub-grantee in writing if the closeout certification cannot be completed within the ninety (90) day closeout period.

However, if audit, litigation, or other legal action by or on behalf of the state or federal government has begun but is not completed at the end of the five year period, or if audit findings, litigation, or other legal action has not been resolved at the end of the five year period, the records shall be retained until resolution. Such records shall be kept in a form that will facilitate the establishment of an audit trail in the event such items are audited.

## **Closeout Requirements**

The Sub-grantee must close out, no later than 90 days after the end date of each program year. The closeout documents are located on the GFBCI AmeriCorps Resources webpage.

In the event that a program ends prior to the end of the program year, the Sub-grantee must adhere to the same closeout requirements. In closing out the AmeriCorps Grant, the following documentation must be submitted to the GFBCI to complete the closeout process:

1. Cover page
2. Certification of Sub Grant Closeout.
3. Final Financial Status Report (SF269A) cumulative over the life of the grant.
4. Final Program Report covering the life of the grant.
5. Inventory of Equipment (with current market value of items \$5,000 or more).
6. Inventory of Unused/Residual Supplies.
7. Check made out to the Alabama Governor's Office of Faith-Based and Community Initiatives for any unspent grant funds.
8. Certification of files to include that files will be maintained in a safe, secure location with two contact names and phone numbers.

## **Federally Declared Disasters**

Should the Sub-grantee participate, the Sub-grantee agrees to submit to the Governor's Office of Faith-Based and Community Initiatives a Corporation for National and Community Service Disaster Response Cooperative Agreement Application Form, within the first 30 days of the program year and prior to engaging members in response to federally-declared disasters. The GFBCI will send the application form to the Office of Emergency Response, Corporation for National and Community Service for processing.

Once processed, this agreement is the legal instrument by which programs can be reimbursed by the Corporation for National and Community Service, for expenses incurred while members are engaged in federally-declared disasters. If a program enters into a Cooperative Agreement directly with the Corporation for National and Community Service they must notify the GFBCI in writing within 30 days of submission to CNCS.

## National Service Criminal History Check

Under the Serve America Act (SAA), all grantees must conduct National Service Criminal History checks on participants and program employees in AmeriCorps, Learn and Serve, Foster Grandparent, Senior Companion and any other programs funded by the Corporation under National Service laws (Title 45 CFR Part 2540, Subpart B, Section 2540, 200-207).

All employees, participants, and others who receive a salary, national service education award, living allowance, or stipend under Corporation grants, even if the activities don't involve service with vulnerable populations, must receive the checks prior to beginning employment or service. Summer of service awards are not considered national service education awards. For the RSVP and VISTA programs, grantees are not required to conduct criminal history checks on their volunteers; however, RSVP and VISTA grantees are required to conduct criminal history checks on all employees who receive part or all of their salary from the respective program grant.

Regulations have been in effect since November 2007 requiring checks on individuals in recurring contact with a vulnerable population, and expanded requirements went into effect on October 1, 2009, establishing coverage of all employees and participants, including those without contact with a vulnerable population.

Beginning in April 21, 2011, programs will also be required to conduct FBI background checks on covered individuals who will have recurring contact with vulnerable populations.

1. Sub-grantee agrees to search based on two (2) separate components of the criminal history check:
  - a. A search (by name or fingerprint) of the State criminal registry for the State in which the program operates and the State in which the individual resides at the time of application;
  - b. A National Sex Offender Public Registry (NSOPR) check is an eligibility requirement and must be completed prior to beginning of member contract.
2. Unless the Corporation approves an **alternative screening protocol**, in determining an individual's suitability to serve in a covered position, Sub-grantees are responsible for conducting and documenting a National Service Criminal History Check.
  - a. An individual who refuses to consent to a State criminal registry check is not eligible to serve. This was previously included in the

preamble to the proposed rule, but not in regulatory language.

- b. No applicant may have unsupervised access to vulnerable individuals (as defined in the rule) until the results of his or her State criminal registry checks have been reviewed and verified by the program.
- c. Programs keep the actual results of the criminal history checks in the participants' files, unless prohibited from doing so by State law, and document in writing the consideration of the participant.

- **Returning Members**

Returning members in an AmeriCorps State program who have been checked through the State criminal registry, are returning to the same program and have no more than a thirty day break in service do not have to undergo a second State criminal history check.

- **Consent**

An individual who refuses to consent to a State criminal registry check is not eligible to serve.

- **Service without Clearance**

No applicant may have unsupervised access to vulnerable individuals (as defined in the rule) until the results of his or her State criminal registry checks have been reviewed and verified by the program.

A program may allow a member to begin their service but the following conditions must be met: A member may not have access to a vulnerable beneficiary without being accompanied by an authorized program representative who has been previously cleared to have such access.

- **Disqualification**

An individual who is subject to a State sex offender registration requirement is deemed unsuitable for, and may not serve in, a covered position. The disqualification includes individuals who are applicants for covered positions, as well as individuals who are currently serving with the organization in a covered position.

An individual convicted of murder is deemed unsuitable for, and may not serve in, a covered position.

- **Cost**

CNCS considers the cost of a criminal history check a reasonable and necessary grant expense. Unless approved by CNCS, a Sub-grantee may not charge applicants for the cost of a criminal history check.

- **Maintenance of National Service Criminal History Check Records**  
Programs keep the actual results of the criminal history checks in the participants' files, unless prohibited from doing so by State law. AmeriCorps State programs can maintain criminal history checks in a separate locked file.

### **Grievance Policy and Procedure**

All AmeriCorps State Programs must maintain and distribute to members a comprehensive grievance procedure inclusive of the following elements:

- Grievance filed within one year of alleged occurrence.
- Grievance hearing within 30 calendar days of filing a grievance.
- Decision made within 60 calendar days of filing a grievance.
- Hearing by person not involved in previous decisions on the issue.
- Grievant can request binding arbitration if decision is adverse to grievant or if decision is not reached within 60 calendar days.
- Binding arbitration hearing is held within 45 days after request for arbitration or within 30 days after CEO appoints arbitrator.

### **Receipt of a Complaint at the Commission**

When the GFBCI receives a complaint from an AmeriCorps member, the following must occur:

- If by telephone, the name of caller, program, year(s) served, and nature of complaint should be documented.
- Caller must be asked whether they are aware of the grievance policy from their program and if yes, have they followed it.
- If no, caller should be redirected to the Program Director at their appropriate program site.
- If caller states they have followed the proper procedure and are still dissatisfied, they must submit a formal complaint in writing to the GFBCI Director for further review.

### **Evaluations**

The following table indicates type and frequency of evaluation required based on CNCS funding.

<b><i>If you are a...</i></b>	<b><i>You will submit an...</i></b>
State formula grantee	Evaluation as specified by your state commission.
State competitive grantee with an average annual Corporation grant under \$500,000	Internal Evaluation
State competitive grantee with an average annual Corporation grant of \$500,000 or more	Independent Evaluation
National grantee with an average annual Corporation grant under \$500,000	Internal Evaluation
National grantee with an average	Independent Evaluation

annual Corporation grant of \$500,000 or more	
State and National Education Award Program (EAP) grantee, regardless of funding	Internal Evaluation

Per CNCS guidance: If you are recompeting in 2007 or thereafter, you are required to submit “a summary of your evaluation efforts or plan to date, and a copy of any evaluation that has been completed, as part of your application for funding” (45 CFR § 2522.730). If you re compete again in 2010 or beyond, you are required to submit a completed evaluation with your application. The Corporation will consider the results of your evaluation “in assessing the quality and outcomes of your program” (45 CFR § 2522.470). If you are submitting a continuation application in 2007, you do not have to submit an evaluation summary or plan until you re compete.

External Evaluations: If you receive an average of \$500,000 or more per year from the Corporation, averaged over the last three years of funding you have received before you re compete, we expect you to conduct an independent evaluation by contracting with an external evaluator. The AmeriCorps regulations describe how this evaluation should provide evidence of a causal relationship between program activities and outcomes (45 CFR § 2522.700). You may consider using an experimental or quasi-experimental design, or compare your results with national/state/local data. Your external evaluation method should match the size, scale, and purpose of your program.

Internal Evaluations: If you are required to conduct an internal evaluation, we expect your design to include the same high quality and degree of rigor required of a larger grantee, even if you are collecting less data and analyzing fewer indicators. Staff members and other stakeholders can serve as internal evaluators. However, the internal evaluators should have expertise in research methods and evaluation design. Your internal evaluation method should match the size, scale, and purpose of your program.

## **B. Financial Policies and Procedures**

*The following policies and procedures are in accordance with state policy, federal policy and applicable statutes.*

The Governor’s Office of Faith-Based and Community Initiatives implements financial procedures according to the Office of Management and Budget (OMB) Circular requirements, State of Alabama requirements, CNCS Grant Provisions, and other grant provisions awarded to the agency.

Internal controls are implemented based on the State of Alabama Fiscal Policy and Procedures, State of Alabama Property Inventory Policy and GFBCI Internal Financial agency controls.

GFBCI internal financial agency controls include: agency accounting, purchasing, and sub-grantee program management. GFBCI financial policy is a supplement to the State of Alabama Fiscal Policy and Procedures.

The structure and description of the financial accounting system is referenced in the State of Alabama *Fiscal Policy and Procedures Manual*.

### **GFBCI Purchasing**

GFBCI implements its own agency procurement for items of \$499 and below. Two to three quotes are gathered and a GFBCI purchase order is issued for purchase of an item from the lowest of the quotes. If a specific brand is needed, additional quotes are not necessarily needed if the item is provided by a sole source or few providers. Vendors listed on the state contract will not require quotes. GFBCI purchase order(s) is tracked on an agency spreadsheet. Office supplies will be purchased or coordinated with the accountant for approval of funding.

Some expenses may be paid as a direct pay with proper office approval. Expenses that may be paid directly but are not limited to are as follows:

- \* Utilities
- \* Registration fees
- \* Printing jobs not to exceeded \$500 per job

### **Allocation Of Expenses**

The expenses will be allocated to grants where allowable and applicable. Allocation of expenses to grants may apply when authorized individuals of GFBCI perform work or usage under a specific grant. Grant approval may apply in some cases.

### **Payables**

When invoices are received, they are signed or initialed by the Director for approval of payment. Once invoices are approved, the invoices/payment vouchers will be given to the accountant(s) for processing. At this time purchase order(s) and the invoice will be matched for processing. Once processed, payables documents that are being paid with federal funds are given to the Grants and Contracts accountant in DMH for tracking of federal funds drawn down for expenditures and all other vouchers are given to DMH Accounts Payable (AP) supervisor. The vouchers paid with federal funds are given to the AP supervisor after they have been reviewed by the Grants and Contracts accountant. Once approved, a payment voucher will print in the overnight cycle and the next day the documents are taken to the comptroller's office for final approval, processing, and printing of the check. Once the checks are printed, the checks are put in the agency lock box for pickup by Dept of Mental Health AP department. Once checks are picked up they are mailed or hand delivered by DMH AP department or GFBCI accountant.

## **Budget**

All budget revisions are initiated by the GFBCI designated person of authority (*accountant, program officer, or Director*). State revisions may be initiated by DMH finance. GFBCI initiates revisions request in eGrants or through other funding agencies. The revision request is reviewed, approved and submitted by the GFBCI Director. Once the revisions have been approved in eGrants or through the funding agency, a State of Alabama revision request is prepared by GFBCI to correspond with the approved revision from the funding agency. The state revision is reviewed for accuracy by the DMH operations (budget) accountant. After the revision has been reviewed, the GFBCI Director approves and signs revision, and the request is sent to the Executive Budget Office for final approval and processing.

## **Payroll**

Payroll is processed by the Governor's Office Chief Fiscal Officer. The time sheets are prepared by GFBCI's Director's Assistant and submitted to the Governor's office for processing of payroll. The payroll allocations are prepared by the GFBCI Accountant or DMH finance.

## **In-Kind / Match**

In-kind and most cash match documentation is gathered and compiled into a report by GFBCI staff or DMH. Supporting documentation (*except cash match*) must include the following: date of service or goods, purpose for contributions, description of service or items contributed, and how cost is determined. Cash-match and indirect costs (*such as payroll time and management, etc*) may be supported by actual expenditure reports from the financial system including the source of funds used to pay expenses. For additional information on allowable costs to be used as cash/in-kind match, please refer to 2 CFR 225 (formerly OMB A-87).

## **Financial Status Reports**

All FFRs and 272 reports are prepared by the DMH accountant. Once prepared, documents are given to the GFBCI accountant for review and signature of the GFBCI Director.

## **GFBCI Budget Revision**

Before budget revisions are prepared they must be in compliance with grant guidelines. Some grants require a revision through the funder before a state revision is prepared. If approval from the funder is not required, a state revision may be prepared. The revision is prepared by the GFBCI accountant and it is reviewed by DMH budget accountant. Once reviewed, the revision is signed by GFBCI Director and submitted to the State of Alabama Executive Budget Office. When approved by the budget office, the accounting system is updated with the changes. Budget transfers are allowed without approval from the budget office but limited as long as the expense line item is in accordance with the approved budget from the funder.

The State of Alabama smart budget plan and quartering performance report is prepared according to the Smart Budgeting policies and procedures.

### **Chart Of Accounts**

GFBCI uses the State of Alabama (*Department of Mental Health section*) chart of accounts. An example of the expenditures object code structure is as follows:

<u>Fund</u>	<u>Org</u>	<u>AGCY</u>	<u>OBJ</u>	<u>SUB</u>	<u>OBJ</u>
0783	ADM3	055		0600	08

An example of the revenue code is as follows:

<u>Fund</u>	<u>Org</u>	<u>AGCY</u>	<u>REV</u>	<u>SOUR</u>
0783	ADM3	055		0873

The fund number describes the source of funds for example: federal, non-federal, or state funds. The organization code (*org code*) represents a specific grant. The agency code identifies the state agency / department. The object and sub-object codes (*obj / sub obj*) describes the type of expense.

### **Retention**

Most original financial documents are retained in the Department of Mental Health and stored according to Alabama Retention policy. The list below states where various other original records are maintained:

- Program records (*site visit reports, etc*) - GFBCI
- Accounts payable – State Comptroller’s Office
- Payroll Time sheets - Governor’s Office

GFBCI and sub-grantees are required to maintain program records on file for five (5) years from the date of the final FFR and comply with the State of Alabama retention policy.

### **Inventory**

GFBCI maintains records to track inventory according to the grant the item was coded to. Inventory items are recorded and maintained according to the State of Alabama Inventory policy, AmeriCorps Provisions, and OMB circulars.

### **Grant Closeout Process**

GFBCI closes out grants according to the grant guidelines. If additional problems occur, the grants officer is notified and an extension is requested until the problem is resolved.

### **Sub-Grantee Closeout Process**

GFBCI has a closeout packet that is given to sub-grantees and the following information is included: Cover Page, Final FFR, Certification of Sub-grantee Files, Final Program Report, Equipment Inventory, and Inventory of Residual Supplies. (Re: Instructions for Closing Corporation grants.

[http://www.nationalservice.gov/forms/06\\_1204\\_ac\\_Isa\\_closeout.pdf](http://www.nationalservice.gov/forms/06_1204_ac_Isa_closeout.pdf)).

### **Separation of Duties**

The draw down of federal funds is prepared by the Grants and Contracts accountant, reconciliation of cash accounts and JV entries are prepared by the Accounting Manager and operation accountants in the Department of Mental Health and occasional review of the GFBCI accountant.

All functions of the GFBCI accountant are not limited to the areas described above, but are always reviewed by accountants in the Department of Mental Health.

All documents, processing of reports, or procedures prepared by GFBCI accountant are reviewed by the Department of Mental Health before final signature of GFBCI Director and submission.

### **Description Of Functions For Individual Fiscal Staff**

**GFBCI Accountant** - Operates as a liaison between The Governor's Office of Faith-Based and Community Initiatives and The Department of Mental Health. The GFBCI Accountant is responsible for initiating some accounting functions and preparing analysis reports, budgets, review of expenses for the agency, State of Alabama annual budget and federal budgets for various grants, federal budget revision, inputting invoices for payments, technical assistance, training, and site visits to sub-grantees, and agency inventory and disposition.

The GFBCI Accountant provides financial information to agency staff on a periodic basis for informational purposes of executing budgeted funds. The accountant prepares projection analysis for agency strategic management of funds.

<b>Payables -</b>	Coding of vouchers, and entering into the finance system
<b>Purchasing -</b>	Prepare purchase requests for purchase orders and prepare order request for items under \$500.
<b>Budget -</b>	Initiate and prepare budget revisions and budget transfers
<b>Payroll-</b>	Prepare allocation report
<b>Annual Budget -</b>	Initiate and prepare budget
<b>Inventory -</b>	Monitor and track inventory and submit changes to property manager

- Sub-grantee -** Communicate with programs about corrections in draw request
- Draw request -** Preview of documentation submitted
- Site Monitoring -** Perform site visits, technical assistance to Sub-grantee programs, and training

**DMH Contracts & Grants Supervisor** – The Contracts & Grants Supervisor reviews documents and analysis/reports submitted by the GFBCI Accountant for accuracy and if the costs are reasonable, allocable, and allowable to various grants. The Contracts & Grants Supervisor is responsible for submission of the FFR reports, the Cash Management reports (272), and draw down of federal cash. After the reports or documents submitted have been verified and approved they are submitted for final processing.

- Accounts Payables -** Review of vouchers for allowable cost to grants
- Cash Draws -** Draw down of cash for payment vouchers
- Payroll -** Review allocations and prepare journal entry
- Monthly Reports -** Review of monthly expenditure reports
- FFR & 272 Reports -** Prepare FFR's and 272 reports
- Contracts -** Review of agency contracts

**DMH Contracts & Grants Accountant**

The accountant reviews draw down requests for AmeriCorps and works with the GFBCI accountant with corrections of problems and to verify accuracy of reports submitted in MSL.

- Sub-grantee (Draws) -** Review and processing of sub-grantee draw requests
- FFR -** Prepare aggregate FFR's in MSL

**DMH Accountants Payable Supervisor** – The Accountants Payable Supervisor reviews the payment vouchers for coding accuracy and compliance with the State of Alabama policies. The AP Supervisor then approves and submits the payments to the Comptroller's office for payment.

- Accounts Payables -** Review account coding and documentations submitted for accuracy and approve payments voucher for submission to comptroller's office

**DMH Accounting Manager** – The Accounting Manager is the financial system administrator and manages the agency's general ledger for accuracy and additions to the ledger such as: new coding, accounts receivable, deposits, journal entries initiated by other accountants (*GFBCI and Grants & Contracts Supervisor*)

**Financial System -** Administrator of the accounting system (gives access to the financial system).

**Journal Entries -** Post journal entries

**DMH Operations Accountant (Budget)** – The operations accountant prepares transfers allowable under various grants when requested by the GFBCI accountant. The Operations accountant reviews State of Alabama revisions submitted by the GFBCI accountant for compliance with federal and state regulation before final submission to the State of Alabama budget office for approval.

**Budget Transfers -** Approve and post budget transfers

**Budget Revisions -** Review budget revisions before they are submitted to the Executive Budget Office

**Governor’s Office Chief Fiscal Officer** – Processes payroll for the Governor’s Office of Faith-Based and Community Initiatives

**DMH Property Manager** – Reviews and monitors the purchase of property and supply items with value of more than \$100. The GFBCI accountant provides the MH / Property Manager with supporting documentation as of supplies and inventory items as they are purchased. MH/Property manager enters property into the State of Alabama inventory system.

**Inventory -** Review new inventory items and transfers  
Administer inventory

### **Fiscal Management**

The Sub-grantee must demonstrate the capacity to maintain a sound financial management system that will:

1. Provide documentation necessary for required reports.
2. Demonstrate effective fiscal controls.
3. Demonstrate strong budgetary and internal controls, adequate accounting, and written policies and procedures.
4. Provide a plan for sustaining services in the absence of AmeriCorps funding.
5. Demonstrate compliance with the Corporation for National and Community Service’s (hereinafter “Corporation”) match on a consistent basis and ensure that the match is met.

The Sub-grantee understands and agrees to adequately cover with fidelity insurance all individuals who receive, disburse or handle any funds that are provided by GFBCI.

### **Budgetary Changes Requiring Prior Written Approval From The GFBCI**

The Sub-grantee agrees to obtain *written approval* of the GFBCI before deviating from its budget, including any of the following:

1. All budget revisions require GFBCI approval. Budget revisions exceeding 10% of the total budget will be submitted by GFBCI to the Corporation for approval.
2. Specific items requiring prior approval under OMB Circulars A-21, A-87, or A-122, require approval of the GFBCI.
3. Programs must request slot conversions in writing to the GFBCI prior to making changes in the Portal. If the slot conversion requires a budget revision, the budget revision must be approved by the GFBCI prior to the completion of the slot conversion.

### **State Requirements (GFBCI) – Draw Downs**

The following forms and information should be included when submitting a draw down request *if it is applicable to grant award*:

1. Certification Cover Sheet
2. Field Voucher
3. Periodic Expense Report (PER)
4. Draw Calculations Sheet (when applicable)
5. Member Roster Report from the Portal
6. General Ledger, General Journal, and/or Payroll Register for the time period covered in the draw request
7. Support documentation for all expenditures, i.e., invoices, detailed receipts, travel reimbursement forms, etc. (when applicable)
8. Quarterly FFR (Due by 10<sup>th</sup> of appropriate month)
9. In-Kind Form (when applicable)

Once the hard copies and supporting documentation (when applicable) are received, the draw request will have a final review and be processed upon verification of documentation submitted. If a problem or error occurs in the information submitted, payment will not be made until problem or error has been corrected.

Sub-grantees are required to submit financial reimbursement requests based upon the schedule in the program contract, Attachment 1.

## **State Requirements (GFBCI) – Travel**

Sub-grantees may follow their agency travel policies if reimbursing personnel or members from program award. Sub-grantees must follow the State of Alabama travel policy when reimbursement of travel is being requested for PDAT or other GFBCI funds.

## **Financial Reporting**

Program financial reports are submitted via the My Service Log web-based reporting system.

- Periodic Expense Report (PER) - Also referred to as PER Draw Request Form. This is completed according to the schedule set in the program contract, Attachment 1.
- Federal Financial Report (FFR) - This report shows expenditures for a designated period. The FFRs must be submitted to the GFBCI for review and processing by the Department of Mental Health (DMH).

## **Audit Requirements**

The Sub-grantee agrees to meet all Federal and State financial reporting requirements for this grant. A Sub-grantee that expends \$500,000 or more of total federal awards in a fiscal year is required to obtain an audit nine months after the close of the fiscal year. All audits must be conducted by an independent auditor in accordance with the Single Audit Act, as amended, 31 U. S. C. 7501, et seq., and OMB Circular A-133. Failure to provide timely audits could result in the termination of this agreement and any subsequent funding.

If the Sub-grantee expends federal awards under one federal program, it may elect to have a program specific audit, if otherwise eligible. A Sub-grantee that does not expend \$500,000 in federal awards is exempt from the single audit requirements of OMB Circular A-133 for the year. However, if the Sub-grantee does not meet the threshold for an A-133 audit, the Sub-grantee must submit a single or yellow book audit.

## **Subject to Funds Availability**

If this contract is terminated before the required services have been completed, GFBCI may pay Sub-grantee an amount equal to GFBCI's estimated value of the work completed. The parties hereto agree that their responsibilities one to another are contingent upon the availability of state and/or federal funds and that such responsibilities shall terminate if said funds cease to be available. The GFBCI is subject to the appropriation and availability of Federal Funds. In the event that the funds are not appropriated or are otherwise unavailable, the GFBCI reserves the right to terminate the contract upon written notice to the Sub-grantee. Said termination shall not be deemed a Breach of Contract by the GFBCI.

## **Payment Methodology**

The Sub-grantee shall be compensated on a *reimbursement* basis for actual, reasonable and necessary costs based on the approved AmeriCorps Budget, not to exceed the maximum liability established in the approved budget.

*Requests for reimbursement of expenditures for the previous month shall be submitted by the 10th of the month.* (Refer to the PER/FFR Due Dates in Attachment 1 of the program contract.)

## **Advances**

The amount of advance payments requested by the grantee must be based on actual and immediate cash needs in order to minimize federal cash on hand in accordance with policies established by the U.S. Department of the Treasury in 31 C.F.R. 205. The Sub-grantee must follow these steps when requesting an advance:

- The Sub-grantee must submit justification of an immediate cash need.
- At the end of each reporting period, the grantee must submit a financial report of expenditures and supporting documentation that includes the pay dates for the expenses.

Submitted reports and documentation are reconciled with cash to determine if funds were disbursed according to OMB circular guidelines and if expenses balance to the cash amount received.

GFBCI and/or the Alabama Department of Mental Health may disapprove advances if the Sub-grantee does not establish procedures to minimize the time elapsing between the receipt of the cash advance and its disbursement.

Sub-grantees must be current in submission of draw packages (prior month's draw package received by the 10<sup>th</sup> of the following month) in order to request an advance. Advances are considered on a case by case basis.

## **Unallowable Costs**

The Sub-grantee's AmeriCorps *Periodic Expense Report (PER)* shall be subject to reduction for amounts which are determined by the GFBCI, on the basis of audits or monitoring conducted in accordance with the terms of the contract, not to constitute allowable costs.

## **Liability Insurance and Safety Issues**

The Sub-grantee agrees to maintain adequate insurance coverage for professional liability, comprehensive general liability, and other insurance as necessary to insure the Sub-grantee and/or its Board against any event or loss, which would impair the Sub-grantee's ability to carry out the terms and conditions of all GFBCI contracts and/or grants.

### **Staff Requirements and Staff Timesheets**

The Sub-grantee must adequately staff the AmeriCorps grant. Stipulations about staffing requirements can be made by the Commission based on the size and scope of the AmeriCorps project. In addition, the Sub-grantee must designate a staff person with an accounting background to perform all the fiscal requirements of the grant. Staff must maintain timesheets that demonstrate actual time worked on the AmeriCorps program.

### **Equipment Reporting Requirements (Single items over \$5,000)**

Sub-grantees must report serial numbers of equipment purchased with the AmeriCorps grant and update this information periodically. For any Sub-grantee that is terminated or ceases to be funded, equipment purchased under the grant is the property of the GFBCI and must be returned to the GFBCI. If the program wants to make any other arrangements for disposal of equipment, it must be in writing and approved by the GFBCI.

### **Suspension / Withholding of Payments**

GFBCI has the authority to withhold payments from Sub-grantees if critical violations have material effects on the operation of the AmeriCorps programs. Failure to comply with any condition of the GFBCI/Alabama State Service Commission AmeriCorps State policies and procedures or with the **current AmeriCorps® Provisions**, will place your program in a state of non-compliance. No draw downs will be accepted, nor will draw downs that are in house be processed, while a program is in a state of non-compliance.

A program will remain in a state of non-compliance until evidence to the contrary is provided to the Governor's Office of Faith-Based and Community Initiatives. If a program has made serious violations, the program will be notified in writing with a request to develop a plan for corrective action and a timeline for implementation. If progress has not been made within the timeline, a request to suspend payments will be made pending appropriate approval.