**member file review**

**Overview**

For each Operating AmeriCorps sub-grantee, OneStar will conduct a member file review at least once during a three-year project period. Additional member file document reviews or random sample testing of member documents may occur (on-site or desk-based) dependent on risk and/or red flags identified throughout the program year.

**Scope + Tool Preparation**

**Determining Scope:**

* Prior to a site visit or desk-based review, the Grants Officer (Program) will determine the scope of the review.
* For regular on-site reviews, the Grants Officer (Program) should ensure that a representative sample is tested. This could include:
	+ Testing different member types, if applicable to the sub-grantee
	+ Testing members who started late or ended early
	+ Testing members who earned a partial award
	+ Testing members who earned exactly the minimum number of hours required
	+ Ensure that a sample from each year in the project period is tested including the current active year.
		- If there are any years outside of the project period that have not been previously tested by OneStar or the OIG, ensure that a sample is also tested from those years.
	+ A sample methodology that can be used is to test at least a minimum of 6 member files or 10% - whichever is greater.
		- For programs with 100+ members, a minimum of 10 files should be tested and additional staff should be included to assist with the review. This can include the Project Coordinator or a second Grants Officer.
		- Having the program submit some documentation (i.e. timesheets) prior to the visit can be an option as well.
* The members should be selected based on the Member Rosters found in My AmeriCorps under “S&N Reports”.
* Download the Member Roster Reports from e-Grants by entering the Program's Code (e.g. 06AFHTX0010050) and the first year of the grant year (e.g. 2008 for a 2008-2009 budget period) under which an organization is funded and that is being tested. This will require a separate download for each year that is tested.
* Once the reports are downloaded, select the member sample to be tested in accordance with the Determining Scope section above.

**Tool Preparation and Set-Up:**

* Open the Member File Review Tool and save it in the appropriate sub-grantee Monitoring folder as “Organization/Program Name\_Member File Review\_onsite visit\_0000”. Example: Amarillo ISD\_Member File Review\_onsite visit\_2011.
* On the first tab of the Member File Review Tool, enter in the following based on the information from the Member Rosters downloaded from My AmeriCorps:
	+ Member Name and program year to be tested (enter this in rows 1 and 2 of the tool)
	+ Member Type (enter this in row 3 of the tool)
	+ Education Award type (enter this in row 4 of the tool)
	+ Start date from member roster (enter this in row 31 of the tool)
	+ Completion date from member roster (enter this in row 39 of the tool)
	+ Total hours earned (enter this in row 42 of the tool)
* On the consecutive tabs in the Member File Review Tool, enter in the member names to be tested (one member name per tab). These tabs will capture the time recorded on the member timesheets.
	+ If member timesheets are requested prior to the visit, the timesheet totals can be entered beforehand.

**Monitoring**

**General Guidance**

* While each member file is reviewed for its individual findings, it is also important to look for any findings that may be systemic and be symptoms of larger program management issues to address in policies or signify a need for further training on requirements.
* On site reviews can be very time intensive, including additional staff or requesting documentation before hand to review can be a helpful way to make the most use of the time on site.

**Eligibility**

The Grants Officer (Program)will use the member file documents and the Member File Review Tool to ensure compliance with eligibility requirements as follows:

* Proof that the member is a citizen, national, or lawful permanent resident alien of the United States
	+ Primary documentation of status as a U.S. citizen or national. One of the following forms of identification is acceptable:
		- Birth certificate showing that the individual was born in one of the 50 states, the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, American Samoa, or the Northern Marina Islands.
		- A United States Passport
		- A report of birth abroad of a U.S. Citizen (FS–240) issued by the State Department
		- A certificate of birth-foreign service (FS 545) issued by the State Department
		- A certification of report of birth (DS–1350) issued by the State Department
		- A certificate of naturalization (Form N–550 or N–570) issued by the INS
		- A certificate of citizenship (Form N–560 or N–561) issued by the INS
	1. Primary documentation of status as a lawful permanent resident of the U.S. One of the following forms of identification is acceptable:
* Permanent Resident Card, INS Form I–551
* Alien Registration Receipt Card, INS Form I–551
* A passport indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence
* A Departure Record (INS Form I–94) indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence
* Proof that the member has met the age requirements. Member is 18 years of age or older or member is 17 years of age and has obtained parental consent to enroll in the AmeriCorps program.
* Proof that the member has met the high school eligibility requirement.
	+ The member has a high school diploma or its equivalent and has provided a copy of the document or self-certified under penalty of perjury that he/she has obtained this;
	+ or has certified that he/she has not dropped out of elementary or secondary school to enroll as an AmeriCorps participant and must agree to obtain a high school diploma or its equivalent prior to using the education award;
	+ or the member has obtained a waiver from the Corporation of the requirements in paragraphs (a)(2)(i) and (a)(2)(ii) of § 2522.200 based on an independent evaluation secured by the program demonstrating that the individual is not capable of obtaining a high school diploma or its equivalent;
	+ or is enrolled in an institution of higher education on an ability to benefit basis and be considered eligible for funds under section 484 of the Higher Education Act of 1965 (20 U.S.C. 1091).

**National Service Criminal History Check**

* **Overall** – The program was consistently conducting National Service Criminal History Checks (NSCHCs) both in alignment with federal requirements and the program’s own policies and procedures. Program may be using an internal verification form or other documentation.
* **NSOPW Check** – Documentation exists that the program ran a national check on the Dru Sjodin National Sex Offender Public Website (NSOPW) <http://www.nsopw.gov> on all members serving as of November 23, 2007 and has a printed copy of the results with a staff member’s notes and initials/signature demonstrating that the member did not match any of the results listed. NSOPW must be completed on or before the start of service.
* **State of Service (TX) Check** – Documentation exists that the program ran a State of Service (TX) check using a CNCS-approved repository (TX DPS public or secure site) and that the check was initiated on/before the member’s start of service. The program has documented the check initiation/completion dates.
* **State of Residence Check (if applicable**) – If a member resided in a different state at the time of application, documentation exists that the program ran a State of Residence check using a CNCS-approved repository and that the check was initiated on/before the member’s start of service. The program has documented the check initiation/completion dates. (Note: Until the new rule is issued in 2012, it is OneStar’s understanding that FBI checks were considered adequate substitutes for this check).
* **FBI Fingerprint-based Check (if recurring access to vulnerable populations after April 21, 2011)** – Documentation exists that the program ran fingerprint-based FBI checks on applicable members and that the check was initiated on/before the member’s start of service. The program has documented the check initiation/completion dates.
* **Accompaniment documentation (if member had access to vulnerable populations while either state and/or FBI checks were pending)** – The program had a consistent practice of using qualified “accompaniers” to accompany members whose checks were pending. Accompaniment was clearly documented using program forms and/or timesheets.

**Enrollment, Change of Status and Exit**

* Enrollment date alignment: The Grants Officer (Program) will enter in the following dates listed on the following documents and determine if they are aligned. Any misaligned dates should be highlighted in red and are noted as a finding.
	+ Start date from timesheet
	+ Start date from My AmeriCorps enrollment (date from member roster that was pre-entered)
	+ Start date listed in the member’s contract
	+ The date the member signed the member contract
	+ The date the member signed the enrollment form (or submitted in electronically in My AmeriCorps if the application/enrollment was initiated within the My AmeriCorps system)
* If the member had any change of status (i.e. changing member types or being suspended), this documentation should be included in the file.
* Exit/end date alignment: The Grants Officer (Program)will enter in the following dates listed on the following documents and determine if they are aligned. Any misaligned dates should be highlighted in red and are noted as a finding.
	+ End date from timesheet
	+ End date from My AmeriCorps enrollment (date from member roster that was pre-entered into the tool)
	+ End date listed in the member’s contract
* Personal Compelling Circumstances: If the member was exited for personal compelling circumstances, this should be designated on the Member File Review tool.
	+ The member file must include adequate documentation demonstrating that the exit meets the criteria outlined in the regulations § 2522.230

**Timekeeping**

For each member file, OneStar will review each timesheet for the following:

* Ensure all timesheets are on file for the entire term of service (includes zero hour timesheets, if applicable)
* Review, calculate, and enter the hours on each timesheet included in the file. These hours are entered into the Member File Review Tool under the member’s designated timesheet tab.
	+ The hours should be entered by direct service, training, and fundraising.
	+ Any notes should be entered into the worksheet that will capture any changes not initialed by the program and member, any questionable activities, any timesheets captured in pencil and not pen.

For each member file, OneStar will review the total hours to ensure following two sources match:

* Total hours listed in My AmeriCorps (hours pulled from member roster that was pre-entered into the tool)
* Total hours from calculating time from timesheets
* If the hours do not align and the hours supported by the timesheets are less than what the minimum hours required, this must be noted as a finding, could result in a disallowed education award, and requires follow up action.
* If the hours do not align, but the hours supported by the timesheets are greater than what the minimum hours required are, then this should be noted as a finding but no education award or follow up action may be needed.
	+ However, if it is a systemic error that many of the members’ files are miscalculated, this should be noted as a finding and possible follow up action to correct the deficiencies in the timekeeping system may be necessary.

**Member Evaluations**

For each member file, OneStar will review to ensure that the member has the appropriate performance evaluations on file in accordance with the AmeriCorps provisions.

* 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:
	+ Whether the member has completed the required number of hours;
	+ Whether the member has satisfactorily completed assignments; and
	+ Whether the member has met other performance criteria that were clearly communicated at the beginning of the term of service.

**Resolution**

While on site, the Grants Officer will seek to resolve as many issues as feasible. It is common that many issues can be resolved quickly while on site, for example missing documentation in the file may simply be misplaced.

Following the site visit, OneStar will release the written monitoring report in accordance with the timeframe outlined in the OneStar scorecard. Resolution will occur in accordance with the Resolution Policy and resolution timelines outlined in the OneStar scorecard.

If any systemic issues are identified, an expanded scope or follow-up testing may be required and should be entered in the report and monitoring plan.

**Required Forms and Documents**

 E-Grants/My AmeriCorps Usage

<http://www.nationalserviceresources.org/ac-training-support-state>

Member File Review Tool

Z:\OneStar Shared\SERVICE AND VOLUNTEERISM\AmeriCorps Texas Policies and Procedures\Monitoring and Resolution

**Related Topics**

* Program Monitoring Menu
* Program Document Review
* Resolution Policy