

CORPORATION FOR NATIONAL & COMMUNITY SERVICE

OFFICE OF INSPECTOR GENERAL

Agreed-Upon Procedures for
Selected Corporation for National
and Community Service Grants
Awarded to Conservation Legacy

OIG Report 19-07

Prepared by

Cotton & Company LLP

635 Slater Lane, 4th Floor

Alexandria, VA 22314

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This report was issued to CNCS Management on May, 2 2019. The report contains no findings or recommendations. There is no resolution required by CNCS Management.



May 2, 2019

MEMORANDUM TO: Chester Spellman
Director of AmeriCorps State and National

FROM: Monique P. Colter /s/
Assistant Inspector General for Audit

SUBJECT: *OIG Report 19-07, Agreed-Upon Procedures for Selected Corporation for National and Community Service Grants Awarded to Conservation Legacy*

Attached is the final report for the above engagement. This agreed-upon procedures (AUP) review was conducted by Cotton & Company LLP in accordance with attestation standards established by the American Institute of Certified Public Accountants and *Government Auditing Standards*, issued by the Comptroller General of the United States. The AUP did not include the Conservation Legacy VISTA grants or subgrants awarded by the Arizona Governor's Commission on Service and Volunteerism, or the Student Conservation Association.

The auditors did not question costs, find non-compliances with grant terms or regulations. There are no recommendations in this report and therefore no resolution is required.

If you have questions pertaining to this report, please contact me at M.Colter@cncsoig.gov, (202) 606-9360.

Enclosure:
As stated

cc: Amy Sovocool, Chief External Affairs Officer, Conservation Legacy
Barbara Stewart, Chief Executive Officer
Desiree Tucker-Sorini, Chief of Staff
Bob McCarty, Chief Financial Officer
Tim Noelker, General Counsel
Jennifer Bastress Tahmasebi, Deputy Director, AmeriCorps State and National
Joseph Liciardello, Acting Chief Grants Officer
Autumn Rose, Senior Grants Officer, Audit and Policy, Office of Audit and Debt Resolution
Lora Pollari-Welbes, Audits and Investigations Program Manager
Melissa Langley, Special Assistant, AmeriCorps State and National
Michael Gillespie, Partner, Cotton & Company LLP

**OFFICE OF INSPECTOR GENERAL
AGREED-UPON PROCEDURES FOR
CORPORATION FOR NATIONAL AND COMMUNITY SERVICE
GRANTS AWARDED TO
CONSERVATION LEGACY**

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Office of Inspector General
Corporation for National and Community Service

**INDEPENDENT ACCOUNTANTS' REPORT ON
APPLYING AGREED-UPON PROCEDURES**

Cotton & Company LLP, an independent certified public accounting firm, performed the procedures detailed in the Corporation for National and Community Service Office of Inspector General's (CNCS-OIG's) *Agreed-Upon Procedures for Corporation Awards to State Commissions Without VISTA Grantees (including Subgrantees)* program, dated June 2016. The CNCS-OIG agreed to these procedures solely to assist it in grant cost and compliance testing of Corporation for National and Community Service (CNCS)-funded Federal assistance provided to Conservation Legacy for the awards detailed below.

We performed this agreed-upon procedures (AUP) engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants and Generally Accepted Government Auditing Standards. The sufficiency of these procedures is solely the responsibility of the CNCS-OIG. Consequently, we make no representation regarding the sufficiency of the procedures, either for the purpose for which this report has been requested or for any other purpose.

AUP SCOPE

On behalf of the CNCS-OIG, Cotton & Company LLP performed AUP on Conservation Legacy's administered AmeriCorps funds totaling \$5,082,105 during the two years ending March 31, 2018. This AUP review includes the awards that Conservation Legacy received directly from CNCS and subawards it received through The Corps Network, a nonprofit entity that received grant awards from CNCS.

Our procedures covered testing the following awards:

Grant Program	Award No.	Award Period	AUP Period	Awards in AUP Period	Claimed Federal Costs
Direct Awards					
AmeriCorps Fixed Amount	15EDHCO001	01/01/16-12/31/18	01/01/16-03/31/18	\$1,867,577	\$1,221,814
AmeriCorps Fixed Amount	16EDHCO001	08/01/16-07/31/19	08/01/16-03/31/18	\$628,474	\$289,953
Disaster Response	Various ¹	01/08/13-01/08/18	07/06/16-01/08/18	\$724,710	\$458,646
Pass-through Awards²					
AmeriCorps National	13NDHDC001	10/01/15-09/30/16	03/01/16-09/30/16	\$494,042	\$292,133
AmeriCorps National	16NDHDC004	10/01/16-09/30/18	10/01/16-02/28/18	<u>\$1,367,302</u>	<u>\$934,721</u>
Total				<u>\$5,082,105</u>	<u>\$3,197,267</u>

AUP RESULTS

Based on our testing of awards issued to Conservation Legacy during this period, we did not question any claimed Federal costs, match costs, or member education awards or identify any compliance findings related to the costs claimed by Conservation Legacy on its AmeriCorps awards and subawards.

The CNCS-OIG's AUP program included:

- Obtaining an understanding of Conservation Legacy's programs.
- Testing Conservation Legacy member files to verify that records supported eligibility to serve and receive education awards.
- Testing compliance with selected AmeriCorps provisions and award terms and conditions.
- Testing Federal and matching grant costs claimed by Conservation Legacy to ensure that claimed costs were reasonable and allowable in accordance with applicable Office of Management and Budget (OMB) circulars and Uniform Guidance and grant award terms and conditions.

¹The cooperative agreement did not have an award number. The cooperative agreement was comprised of 18 separate Mission Assignments. The Mission Assignment numbers included in the AUP period were 4272DR-TX-CNCS-03, 4273DR-WV-CNCS-03, 4277DR-LA-CNCS-01, 4332DR-TX-CNCS-06, and 4332DR-TX-CNCS-07.

²In addition to the direct awards it received from CNCS, Conservation Legacy also received subawards from The Corps Network.

We tested these AmeriCorps program awards at Conservation Legacy. We reviewed the Disaster Response reimbursements that Conservation Legacy submitted to CNCS from July 2016 through December 2017 and reimbursements that Conservation Legacy submitted to The Corps Network from March 2016 through February 2018. We tested a sample of salary and benefit costs and tested the reasonableness of other direct costs claimed by Conservation Legacy on its reimbursement requests to The Corps Network. We also tested the reasonableness of the lost fee-for-service that Conservation Legacy claimed on its Disaster Response reimbursements to CNCS. We also evaluated Conservation Legacy's compliance with grant terms and conditions, as outlined in the AUP from January 2016 through March 2018.

We performed testing from September 2018 through December 2018 at the Cotton & Company office in Alexandria, Virginia and at the Conservation Legacy office in Durango, Colorado. On March 4, 2019, we discussed the contents of this report with Conservation Legacy and CNCS representatives.

In responding to our draft report, Conservation Legacy stated that it concurred with the AUP scope, accepted the report, and took pride in its management of Federal funds. Conservation Legacy also thanked the CNCS staff who helped ensure that its policies and procedures comply with Federal regulations and requirements. We have included Conservation Legacy's April 12, 2019 response in its entirety in the Appendix. CNCS did not provide a formal response to the report but stated in an April 5, 2019 email that it was pleased with the AUP results and the work of the CNCS and Conservation Legacy staff that contributed to the results.

BACKGROUND

CNCS, under the authority of the National Community Service Trust Act of 1993 (as amended), awards grants and cooperative agreements to State Commissions, nonprofit entities, and tribes and territories to assist in the creation of full- and part-time national and community service positions. AmeriCorps members perform service activities to meet educational, human, environmental, and public safety needs. In return, eligible members may receive a living allowance and post-service education benefits.

Conservation Legacy is located in Durango, Colorado and is one of the largest non-profit conservation corps programs in the country. It engages individuals to complete conservation projects throughout the nation. It is funded primarily through partnerships with public land management agencies such as the Federal Departments of the Interior and Agriculture and awards from CNCS. Conservation Legacy receives multiple grant awards and cooperative agreements from CNCS. It has also received AmeriCorps subawards through The Corps Network, a nonprofit entity that receives grant awards directly from CNCS.

We were not engaged to and did not perform an examination or a review, the objective of which would be the expression of an opinion on the subject matter. Accordingly, we do not express such an opinion. Had we performed other procedures, other matters might have come to our attention that would have been reported.

This report is intended solely for the information and use of the CNCS-OIG, CNCS, Conservation Legacy, and U.S. Congress and is not intended to be, and should not be, used by anyone other than these specified parties.

COTTON & COMPANY LLP

A handwritten signature in black ink, appearing to read "Michael W. Gillespie".

Michael W. Gillespie, CPA, CFE
Partner
April 30, 2019



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APPENDIX

April 12, 2019

Monique P. Colter
Assistant Inspector General for Audit
Corporation for National and Community Service
250 E St. NW, Suite 4100
Washington DC, 20525

RE: Request for Comments on AUP

Dear Ms. Colter,

We appreciate the opportunity to respond to the draft report for the OIG's Agreed-Upon Procedures for the Corporation for National and Community Service Grants Awarded to Conservation Legacy dated April 5, 2019.

Conservation Legacy reviewed the OIG Independent Accountant's Report on Applying Agreed-Upon Procedures, concurs with the scope as described, and accepts the report. We take pride in accurate and effective management of federal funds.

We also want to recognize and thank staff from the Corporation for National and Community Service who have helped ensure our policies and procedures are in compliance with federal regulations and requirements.

Sincerely,

Amy Sovocool

A handwritten signature in dark ink, appearing to read "Amy Sovocool".

Chief External Affairs Officer, Conservation Legacy

Fostering Conservation Service in Support of Communities and Ecosystems.



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