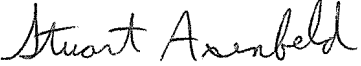




OFFICE OF INSPECTOR GENERAL

October 15, 2010

TO: Robert Velasco II
Chief Operating Officer

FROM: Stuart Axenfeld 
Assistant Inspector General for Audit

SUBJECT: OIG Report 11-04, *Evaluation of Grant Monitoring by the Corporation for National and Community Service*

Attached is the final report for the above-noted Office of Inspector General evaluation of grant monitoring activities conducted by Corporation staff in Fiscal Years 2008 and 2009. We conducted this evaluation in accordance with the quality standards for inspections issued by the Council of Inspectors General on Integrity and Efficiency.

The objective of this evaluation, which was conducted by OIG staff, was to determine whether monitoring activities provided a reasonable basis for the Corporation's findings and conclusions regarding its grantees' operations. Our specific focus was on financial and programmatic monitoring practices for key Corporation grant programs.

Under the Corporation's audit resolution policy, a final management decision on the findings and recommendations in this report is due by April 15, 2011. Notice of final action is due by October 15, 2011.

If you have questions pertaining to this report, please call me at (202) 606-9360, or Ronald Huritz, Audit Manager, at (202) 606-9355.

Attachment

cc: William Anderson, Chief Financial Officer
Kristin McSwain, Chief of Program Operations
Marlene Zakai, Deputy Chief of Staff for Management
Aleda Robinson, Director, Award Oversight and Monitoring
Bridgette Roy, Administrative Assistant, Office of the CFO

Office of Inspector General Corporation for National and Community Service

EVALUATION OF
GRANT MONITORING
BY THE
CORPORATION FOR NATIONAL
AND COMMUNITY SERVICE

OIG REPORT NUMBER 11-04



Corporation for
**NATIONAL &
COMMUNITY
SERVICE**

Prepared by:

Office of Inspector General
1201 New York Avenue, NW
Washington, DC 20525

This report was issued to Corporation management on October 15, 2010. Under the laws and regulations governing audit follow-up, the Corporation is to make final management decisions on the report's findings and recommendations no later than April 15, 2011, and complete its corrective actions by October 15, 2011. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.

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B: Corporation for National and Community Service's Response to Draft Report

EXECUTIVE SUMMARY

The Corporation for National and Community Service (Corporation) uses a variety of monitoring activities to assess the extent to which its grantees and sponsor organizations are carrying out and overseeing their Corporation-funded programs. The Office of Inspector General (OIG) examined the monitoring activities conducted by the Corporation in Fiscal Years (FY) 2008 and 2009 to determine whether the Corporation maintained adequate support for its findings and conclusions. We reviewed the monitoring activities to determine if they were conducted in accordance with Corporation policies and procedures. We also interviewed Corporation staff responsible for conducting monitoring activities to identify any areas that they felt needed improvement, and would aid in conducting monitoring in a more efficient and effective manner.

Using the Corporation's monitoring plans from FYs 2008 and 2009, we selected 70 monitoring records (35 from each fiscal year) to review during our evaluation. They included five records that were deemed by the Corporation to be inactive throughout the fiscal year. The Corporation defines a record as "inactive" if there are extenuating circumstances that requires the Corporation to defer an activity to the next fiscal year or to cancel an activity. Corporation staff must provide a brief reason explaining why the activity was deferred or cancelled. We found that the Corporation was justified in determining that the five planned monitoring activities would become inactive.

Of the remaining 65 records reviewed, we found that the Corporation had adequate documentation and correspondence (i.e notification, follow-up, and or final letters) to support 51 of the monitoring records. For the remaining 14 records, we found exceptions to the Corporation's implementation of Policy AOM-2006-001, Monitoring Activity Documentation in the eGrants Monitoring Module, and its Monitoring Planning Guidance and Implementation Strategy. These exceptions included: notifications and final letters that were not provided to grantees; final and follow-up letters that were not entered into eGrants within the timelines required by Corporation policy; some documentation that was not available in eGrants to support the monitoring findings and conclusions; and changes that were made to planned monitoring activities without updating and providing justifications in eGrants.

In our interviews with Corporation staff, we found that some program officers were responsible for reviewing financial requirements of grantees during their monitoring, yet they had either inadequate or no formal training for this task. We acknowledge the Corporation's efforts, begun in September 2009, to provide financial training to its program officers; however, this training was limited to AmeriCorps VISTA and Senior Corps staff. We believe such training would be beneficial for all Corporation staff who perform monitoring, and would also assist program staff in identifying weaknesses in a grantee's fiscal operations.

BACKGROUND

The Corporation, which is responsible for ensuring its resources are appropriately managed, conducts monitoring visits to award recipients (e.g., grantees, cooperative agreement recipients, and sponsors). In FY 2006, the Corporation moved to a standardized monitoring system to help prioritize activities and allocations of resources for appropriate levels of monitoring, oversight, and technical assistance.

The Corporation monitors activities of its grantees and sponsor organizations to assess their compliance with applicable Federal requirements and achievement of their program goals and objectives. According to Policy No. AOM-2006-002, Oversight and Monitoring Activities, dated July 27, 2006, the Corporation maintains a comprehensive approach to conducting oversight and monitoring of its portfolio. It routinely monitors awards/grants and provides training and technical assistance, as necessary. The Corporation-wide risk assessment serves as the basis for its annual monitoring plan, which includes the following activities:

1. On-site compliance visits
2. Follow-up compliance visits
3. State Standards Reviews
4. On-site training / Technical Assistance visits
5. Targeted / issue-based site visits
6. Opportunity visits
7. Desk reviews
8. Drawdown analyses

These activities are conducted by Corporation staff for select awards throughout the fiscal year; however, they are not conducted for every award each year.

Individual program and grants offices have their own monitoring policies, guidelines, and tools/instruments to help guide the conduct of monitoring activities. Monitoring protocols vary in format, detail and purpose, depending on the nature and intensity of the activity. Corporation policy also requires that staff must document oversight and monitoring activities as appropriate for the type of activity, and in accordance with Corporation or program-specific policy and procedures. Corporation Policy AOM-2006-001 provides requirements for documenting monitoring activities in the eGrants Monitoring Module. The eGrants application is a web-based system that includes a module for tracking planned monitoring activities of Corporation grantees.

The Corporation's Recovery Act Plan, developed in response to the American Recovery and Reinvestment Act of 2009 (ARRA), includes the requirement to monitor all ARRA grantees. The plan calls for the Corporation to monitor all awards made with Recovery Act funding following the same established policies and protocols that are used for the oversight and monitoring of all other Corporation awards.

RESULTS OF EVALUATION

Finding 1. Corporation policy was not consistently followed by program and grant officers.

Of the 14 monitoring records with exceptions noted, we identified the following:

1. Notification and final letters were not provided to grantees (5 records);
2. Final letters and follow-up letters were not submitted within timelines required by Corporation policy (3 records);
3. Some documentation was not available in eGrants to support the monitoring findings and conclusions (2 records); and
4. Changes were made to planned monitoring activities without updating and providing justifications in eGrants (4 records).

We have identified the specific monitoring activities for both fiscal years in Appendix A.

Notification and final letters were not provided to grantees

The Corporation provided the following reasons explaining why notification and final letters were not provided to five grantees:

- Final letters could not be located in eGrants;
- Notification of an upcoming monitoring visit was communicated verbally to the grantee;
- A formal final letter was not issued because a verification of completed actions was discussed verbally with the grantee; and
- A formal final letter was not available because a follow-up training and technical assistance (T/TA) visit was conducted to verify completion of required actions resulting from the monitoring visit.

According to Corporation Policy AOM-2006-001, Monitoring Activity Documentation in the eGrants Monitoring Module, key correspondence includes notification of an upcoming monitoring activity, notification of any required follow-up actions (when applicable), and notification of completed monitoring activities (including required follow up, when applicable). The policy also states that for T/TA events *only*, letters are required for *baseline* monitoring plan T/TA activities. Baseline monitoring plan activities are those identified via the monitoring planning assessment process.

Without such records, neither the Corporation nor the grantee can track the results of monitoring, the actions taken as a result of the findings, and the resolution of the issues raised.

Final letters and follow-up letters were not submitted within timelines specified in Corporation policy

We found that required letters were not submitted according to the timelines specified in the Corporation's policy because:

- There were no follow-up actions required to be completed by the grantees;
- One program officer attended the Corporation's national conference, then took annual leave, resulting in a four-month delay in providing monitoring feedback; and
- There was a lack of understanding by the program officer that letters should have been entered in eGrants.

Corporation Policy AOM-2006-001, Monitoring Activity Documentation in the eGrants Monitoring Module, sets forth the following timeframes for monitoring-related events:

Monitoring Correspondence Timeframes

	Notification Letter	Follow Up / Actions Required Letter (when applicable)	Final / Complete Letter	“Actual Date” of Activity
	<i>eGrants Text Field: Notification (Letter)</i>	<i>eGrants Text Field: Feedback/Actions Req'd (Letter)</i>	<i>eGrants Text Field: Final/Completed (Letter)</i>	
◊ On-site Compliance Visit	< 30 Days > Send letter at least 30 calendar days prior to visit	< 30 Days > Send letter within 30 calendar days after the visit	< 30 Days > Send letter within 30 calendar days after:	Date of first day of on-site visit
◊ Follow-up Compliance Visit		Note: This applies only when the grantee is required to complete follow up actions within a specified timeframe	<ul style="list-style-type: none"> the visit (no follow up actions were required) the grantee completed the follow up actions (if actions were required) 	
◊ Targeted / Issue-based Site Visit	If visit is scheduled less than 30 days prior – send letter within 5 business days of scheduling the visit			
◊ On-site Training / Technical Assistance (T/TA) *				
<p>* T/TA visits <i>only</i>: letters required for <i>baseline</i> monitoring plan T/TA activities; letters optional for <i>additional</i> T/TA monitoring activities.</p>				

A delay in notifying grantees of the results of monitoring events can cause grantees to continue operating in a manner that may not adhere to Corporation requirements.

Documentation for two records was not available to support findings and conclusions

For one monitoring activity we tested from the FY 2008 plan, documentation supporting the findings and conclusions identified could not be provided because the Corporation’s program officer had retired and the documentation was no longer available. The grantee was also not able to provide the information because its computer containing the data was inoperable since the monitoring visit was conducted. These two events prevented the Corporation from accessing the documentation. While the grantee does have documentation to demonstrate that it made modifications to its operations as requested, a paper copy of the response letter could not be located.

In the second case, a monitoring activity conducted in FY 2009, we found that although no compliance issues resulted from a desk review of the grantee, the program officer's documentation could not be located because, once again, the officer had left the Corporation. In discussions with AmeriCorps State and National management, they informed the OIG that they will change their monitoring template to include the type (or name) of documentation reviewed and, if appropriate, a copy of that documentation will be scanned to a monitoring folder on the Corporation's shared computer drive.

Policy AOM-2006-001, Monitoring Activity Documentation in the eGrants Monitoring Module, states:

"Documentation must be maintained in hard copy or electronic files and must be filed and organized, clearly labeled, and readily accessible. If you are located in a multi-person office, monitoring documentation should be accessible by others in your office. This is to support any needed access to the information when you are out of the office. Original correspondence that you send via hard copy or email should also be maintained in the hard copy or electronic file, as appropriate."

Without proper documentation, Corporation management may not be able to assess the adequacy of monitoring.

Changes were made to planned monitoring activities without updating and providing justifications in eGrants

For two monitoring activities that occurred in FY 2008, the activity (training and technical assistance) did not occur as scheduled in the Corporation's baseline monitoring plan, nor was a justification posted in eGrants to explain why the event did not occur. Corporation staff stated that the visit was scheduled on a time-permitting basis, as it was planned in connection with a State Commission meeting. This does not appear to meet the requirements of a baseline T/TA monitoring activity. According to Policy AOM-2006-001, as stated in the chart above, letters are required for baseline monitoring plan T/TA activities. These letters include a Notification letter, Follow Up / Actions Required letter (if required); and a final letter.

For a monitoring activity in FY 2009, the Corporation stated that its oversight in properly updating the monitoring record in eGrants was due to a misunderstanding by training officers of their ability to access and change the original record. During our evaluation, the record was corrected in eGrants to reflect the actual activity, and the reason it was changed from a compliance visit to an opportunity visit.

For another activity in FY 2009, a monitoring event was rescheduled, but the eGrants record was never updated. The record was updated to inactive status during our testing.

According to the Corporation's Monitoring Planning Guidance and Implementation Strategy, only in the case of extenuating circumstances can a monitoring activity be deferred or cancelled for a fiscal year.

Corporation management may not have adequate information on the status of all monitoring activities if timely updates to the plan are not made.

Recommendation One

We recommend that the Corporation ensure that program staff:

- 1a. Document required notification, follow-up, and final letters;
- 1b. Communicate results from monitoring for grantees within established timeframes;
- 1c. Maintain documentation to support findings and conclusions; and
- 1d. Update monitoring records and provide justifications in eGrants when changes are made.

Corporation Response

The Corporation agrees with the recommendation, and is reviewing its eGrants Monitoring Activities Module guidance to ensure clarity. The Corporation is continuing to make improvements to ensure staff understands the monitoring requirements and how to properly document information in eGrants. Its goal is to simplify processes while increasing documentation capabilities in the database. The Corporation expects staff to issue monitoring result letters within established timeframes, and will review its policy to ensure the language and intent are clear for instances when letters must be issued beyond the 30-day timeframe.

OIG Comment

We acknowledge that there may be infrequent occasions when monitoring documentation cannot be promptly entered into eGrants. However, we believe that the 30-day requirement is sufficient time to accomplish this, and encourage management to emphasize this benchmark in future monitoring training sessions.

Finding 2. Corporation program officers responsible for reviewing grantee financial requirements had inadequate or no formal training.

We conducted interviews with 20 Corporation staff, 14 of whom were program officers, between February 1, 2010, and February 12, 2010. We found that 10 of those program officers are responsible for reviewing financial requirements of grantees while conducting monitoring activities. Two program officers had received training on the financial requirements at the Philadelphia Field Financial Management Center (FFMC) in September 2009. One program staff member stated that training was provided on the financial aspects of grants during a training event held two years ago by Walker and Company, then a T/TA provider.

The following are excerpts from our staff interviews:

- Program Officer No. 1 stated that he had asked for training on the financial portion of grant monitoring, but had not received any to date.

- One grants management specialist stated that there should be more training for the program officers on the financial portion of the monitoring tools.
- Program Officer No. 2 stated that he attended the FFMC training and felt it was beneficial for NY-2¹ staff members, and could be a good refresher course for NY-3² staff.
- Program Officer No. 3 felt that there should be a refresher course given to the program officers to keep up with the changing requirements of Corporation grants.
- Program Officer No. 4 stated that she felt intimidated by the financial portion of the monitoring tool. She stated that the tool outlines what source documentation to review; however, without the proper training, she is not sure if the data she is reviewing is sufficient. She had not received any training other than that held in September 2009.
- Program Officer No. 5 stated that the financial portion of the Senior Corps monitoring tool could be difficult to understand if someone did not know what to look for and did not have a nonprofit background. She would like the Corporation to provide training on the financial requirements to new staff members.
- Program Officer No. 6 stated that she has learned by the “seat of her pants”. She explained that she has been learning as she conducts the monitoring. She would like training on the financial portion of the monitoring tool, specifically as it relates to tracing source documentation to accounting system entries.
- Program Officer No. 7 stated that she did not feel confident in conducting the monitoring of financial data because she feels that she could be held liable for not covering a particular area. She would like training on how to review general ledgers and the distinct accounting codes assigned to a financial accounting system.
- Program Officer No. 8 expressed interest in conducting joint visits consisting of a program and grants officer. He stated that due to the workload of the grants office, it is not always feasible to conduct the joint visits. He would also like to receive training on the fiscal component of the tool to ensure that he is identifying any “red light” areas regarding a grantee’s fiscal operations.

According to the Internal Control Standards issued by the General Accounting Office (GAO) in November 1999, management should ensure that employees’ skill needs are continually assessed, and that the organization is able to obtain a workforce that has the required skills necessary to achieve organizational goals. Training should be aimed at developing and retaining employee skill levels to meet changing needs.

We have found that the Corporation’s monitoring plans rely heavily on program officers to conduct the fiscal/financial portion of grantee reviews. Our interviews with Corporation staff revealed that a grant officer is not able to assist a program officer on every monitoring visit. In addition, a grant officer’s workload in the Office of Grants Management can consist of more than 30 grantees, and can exceed 100 grantees at the FFMC. As a result of this demanding workload, we believe that program staff may not always have ample time or expertise to identify weaknesses in various grantees’ fiscal operations.

¹ Corporation Human Resources System (CHRS) Policies define NY-2 staff as Entry Level Administrative/Professional, Senior Technician.

² CHRS Policies define NY-3 personnel as Full Performance Level Administrative Professional

Recommendation Two

We recommend that the Corporation develop a cross-training program for grants and program officers, with increased emphasis on fiscal operations.

Corporation Response

The Corporation agrees with the recommendation. Training sessions have been conducted at the FFMC in Philadelphia and at Washington Headquarters, and a third session is planned for 2011. Monitoring training is being developed and delivered in other program offices, and the Corporation is finalizing a plan to ensure that all program officers receive fiscal training. A significant amount of training funds were allocated in 2010 to develop on-line training modules to address agency-wide monitoring training needs.

OIG Comment

The Corporation's comments are responsive to the recommendation. When fully implemented, the plans put forth in its management response (see Appendix B for the complete response) should provide a satisfactory solution to the weaknesses noted in this and prior reports.

OBJECTIVE, SCOPE, AND METHODOLOGY

We conducted this evaluation in accordance with the quality standards for inspections issued by the Council of Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the evaluation by the collection of information and data that will be focused on the organization, program, activity, or function being inspected, consistent with the inspection objectives, and will be sufficient to provide a reasonable basis for reaching conclusions.

The objective of this evaluation, conducted by OIG staff, was to determine whether Corporation monitoring activities provide a reasonable basis for the Corporation's findings and conclusions regarding its grantees' operations. The scope was limited to monitoring activities conducted in FYs 2008 and 2009, and the focus was on financial and programmatic monitoring practices for key Corporation programs.

We selected a sample of monitoring records and interviewed Corporation staff members who had conducted monitoring activities during either of the fiscal years. We also interviewed managers from each Corporation program and grants office.

ACKNOWLEDGMENT

The OIG has long regarded monitoring as a recurring management challenge and an area needing improvement, based on results of OIG audits of grants, programs, and operations. Previous annual financial audits of the Corporation, performed by independent auditing firms, cited numerous monitoring deficiencies that resulted from audit tests of relatively small samples of transactions. Collectively, the pervasiveness of

these deficiencies was characterized by the auditors as significant internal control weaknesses.

We acknowledge that the Corporation has made substantial progress in addressing the major monitoring challenges reported in prior years. We believe this report, which stresses the need for enhanced training of monitoring personnel, but does not contain a significant number of other deficiencies, also provides evidence of the improvements Corporation management has made.

EXIT CONFERENCE

We conducted an exit conference with Corporation representatives on June 8, 2010, and provided them a draft report to elicit their comments. The Corporation's response to the draft report is included in its entirety at Appendix B.

This report is intended for the information and use of Corporation management, the OIG, and the U.S. Congress. However, this report is a matter of public record and its distribution is not limited.

APPENDIX A

**DETAILED SUMMARY OF FINDINGS
FISCAL YEARS 2008 AND 2009**

Detailed Summary of Findings

FY 2008

<u>Program</u>	<u>Grantee</u>	<u>Details of Findings</u>
AmeriCorps VISTA	Frostburg University	A final letter was not provided to the grantee after follow-up action had been completed.
Senior Corps	Wayne County Action Program, Inc.	There was no written notification letter in eGrants for this monitoring activity. This was an on-site training and technical assistance visit (T/TA), which was considered a baseline monitoring activity.
AmeriCorps State	Volunteer NH	A final letter was submitted to a grantee approximately two months after completion of a monitoring visit.
Senior Corps	Porter Leah Children Center	Grantee was notified of findings approximately four months after monitoring visit was completed.
Senior Corps	Green Mountain Community Network, Inc.	Program officer could not provide all documentation reviewed during a monitoring activity for a grantee. Specifically, the Corporation could not provide the grantee's response to issues noted during the activity.
AmeriCorps VISTA	Older Persons Action Group	Grantee was not monitored according to original monitoring plan. It was determined during the annual monitoring assessment process that this grantee should undergo an onsite training and technical assistance visit. The planned visit did not occur, nor was a justification included in eGrants to explain why it did not occur.
AmeriCorps VISTA	Big Brothers Big Sisters of Alaska	Grantee was not monitored according to original monitoring plan. It was determined during the annual monitoring assessment process that this grantee should undergo an onsite training and technical assistance visit. The planned visit did not occur, nor was a justification included in eGrants to explain why it did not occur.

Detailed Summary of Findings

FY 2009

<u>Program</u>	<u>Grantee</u>	<u>Details of Findings</u>
AmeriCorps VISTA	One Church, One Child of Maryland	Program officer did not have documentation to show that a notification letter was provided to the grantee.
Learn and Serve America	Morehouse School of Medicine	A formal final letter was not provided to the grantee, as required by Corporation policy.
Senior Corps	Senior Resources Solution	A formal final letter was not provided to the grantee, as required by Corporation policy.
Senior Corps	Triton College	The feedback/follow-up letter and the final letter were not issued in the timeframes identified in Corporation policy.
AmeriCorps State	North Carolina Commission on Volunteerism & Community Service	We found that although no compliance issues resulted from the desk review, the documentation to support conclusions made from the review could not be located.
Training and Technical Assistance	Aguirre International, Division of JBS International, Inc.	The monitoring activity was changed from a compliance visit to an opportunity visit due to the lack of available staffing resources. However, the monitoring record was not updated to reflect this change from the original planned monitoring activity.
AmeriCorps National	National Association of Community Health Centers, Inc.	A monitoring event was rescheduled, but the eGrants record was never updated.

APPENDIX B

**CORPORATION FOR NATIONAL AND COMMUNITY
SERVICE'S RESPONSE TO THE DRAFT REPORT**



October 1, 2010

TO: Stuart Axenfeld, Assistant Inspector General for Audit

FROM: Aleda Robinson, ^{CR} Director, Award Oversight and Monitoring

CC: Kristin McSwain, Chief of Program Operations
William Anderson, Chief Financial Officer
Rocco Gaudio, Deputy Chief Financial Officer for Grants
Peg Rosenberry, Director, Office of Grants Management
Claire Moreno, Audit Liaison, Office of Grants Management
Tamara White, Program Analyst, Award Oversight and Monitoring
Bridgette Roy, Administrative Assistant, Office of the CFO

SUBJECT: CNCS Response to the OIG Draft Report on the *Evaluation of Grant Monitoring by the Corporation for National and Community Service*

Thank you for the opportunity to comment on the OIG Draft Report, *Evaluation of Grant Monitoring by the Corporation for National and Community Service*, issued September 2, 2010. This response is the Corporation's draft management decision. The OIG's report is very helpful as the Corporation continues to implement actions aligned with the OIG's recommendations.

The Corporation welcomes this evaluation, in follow up to the *OIG Study of Federal Assistance Tools* in 2008, and is pleased that this evaluation acknowledges the Corporation has made significant progress in addressing prior monitoring challenges and does not identify any significant deficiencies. The Corporation is also pleased that this evaluation affirms that current CNCS priorities for continued improvement of monitoring, such as enhanced training for grants management staff, are properly focused, as recommendations put forth by the OIG align with priority efforts already in progress at the Corporation at the start of this evaluation.

Regarding the OIG's two specific recommendations, the Corporation plans to address them as follows.

Recommendation 1: *We recommend that the Corporation ensure that program staff:*

- 1a. Document required notification, follow-up, and final letters;*
- 1b. Communicate results from monitoring for grantees within established timeframes;*
- 1c. Maintain documentation to support findings and conclusions; and,*
- 1d. Update monitoring records and provide justifications in eGrants when changes are made.*

Management Decision: The Corporation agrees with the recommendations and is reviewing policy AOM-2006-01-2009-3, *Monitoring Plan Activity Documentation*, to ensure staff fully understand documentation requirements and know the expectations for issuing letters to grantees. We also want to facilitate consistency among staff in applying Corporation standards and

expectations for documentation. Further, the Corporation is reviewing its eGrants Monitoring Activities Module guidance and other documentation resources to ensure clarity and is developing additional training on available resources, documentation requirements, and use of the eGrants monitoring module. While the Corporation has developed and issued a variety of resources previously (e.g., documentation requirements, eGrants guidance, training sessions, newsletter highlights), we are continuing to re-evaluate our approach to make improvements and to ensure staff understand the requirements and know how to properly document information in eGrants.

Additionally, the Corporation is exploring possible other alternatives to improve documentation capabilities in eGrants. The Corporation's goal is to simplify processes, while also increasing documentation capabilities in eGrants.

Regarding *Recommendation 1b* specifically, the report identifies instances when letters were not issued to grantees within established timeframes and recommends staff communicate results to grantees within specified timeframes. The report does not, however, acknowledge that the Corporation recognizes that there are instances when letters to grantees cannot be issued within the established 30-day timeframe. Corporation policy addresses and allows for such instances, as discussed during the final stages of the evaluation. The Corporation expects staff to issue letters within established timeframes and will review the policy to ensure the language and intent is clear regarding instances when letters must be issued beyond the established 30-day timeframe.

Recommendation 2: *We recommend that the Corporation develop a cross-training program for grants and program officers, with increased emphasis on fiscal operations.*

Management Decision: The Corporation agrees with the recommendation and established training as a priority beginning in 2009. Previous to that decision, training had been delivered to varying degrees via different methods across the various offices and the Corporation recognized the need to improve its training and ensure all staff receive adequate training. The Office of Field Liaison (OFL), in close coordination with other CNCS offices, developed a comprehensive in-person compliance monitoring training curriculum in 2009 and delivered the first training session in Philadelphia, Pennsylvania in September 2009. The second session was held in Washington, DC in September 2010, and a third session is planned for 2011. OFL also delivered a management-level monitoring training in New York City in 2010 for all state office directors who attended the national conference. These training sessions support OFL's commitment to ensure all 140 OFL program staff members complete in-person monitoring training. Monitoring training is also being collaboratively developed and delivered in other program offices. Additionally, the Corporation is finalizing a plan to ensure all program officers receive fiscal training.

Further, the Corporation allocated a significant amount of training funds in 2010 to develop on-line training modules to help address agency-wide monitoring training needs. Development is underway. As part of the development and implementation of these new training modules, the Corporation will identify requirements regarding which staff positions will be required to complete each of the modules and the timing for completion.

Again, the results of this evaluation have been invaluable and help affirm the Corporation is focused on proper priorities to improve the agency's oversight and monitoring of its programs.