

AmeriCorps Declined to Disallow Costs After a Retired and Senior Volunteer Program (RSVP) Grantee Dissolved

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The AmeriCorps Office of Inspector General (AmeriCorps OIG) investigated allegations of noncompliance with grant terms and conditions stemming from the AmeriCorps Office of Monitoring's (OM) review of the Retired and Senior Volunteer Program – Volunteers in Service (RSVP-VIS). Allegations included that (1) RSVP-VIS's accounting records did not support what it claimed on its Federal Financial Reports (FFRs); (2) two Mileage Tracking and Reimbursement requests (MTRs) for RSVP volunteers were identical, apart from the submitters' names; (3) one of the questionable MTRs was for a volunteer who had the same last name and home address as the RSVP-VIS Executive Director; (4) RSVP-VIS erased the date of an email regarding the adjudication of a National Service Criminal History Check (NSCHC); (5) RSVP-VIS appeared to backdate a signed NSCHC consent form; and (6) RSVP-VIS's policies appeared to have been copied from the internet, because they contained generic language.

AmeriCorps OIG investigated the matter and found additional evidence demonstrating that the Executive Director falsified MTRs for volunteers and backdated an NSCHC consent form. During an interview, the Executive Director claimed her AmeriCorps Portfolio Manager was unresponsive for six months and that she did not receive training from AmeriCorps.

AmeriCorps OIG briefed a United States Attorney's Office on the matter, which declined to prosecute. AmeriCorps OIG issued a Report of Investigation (ROI) to AmeriCorps detailing the results of the investigation and making recommendations including: (1) disallow expenses reported on RSVP-VIS's FFRs that were not supported by adequate documentation, (2) disallow costs for the falsified MTRs, (3) expand the scope of the monitoring to cover the entire period of RSVP-VIS's grant, (4) verify the Executive Director's claims that the Portfolio Manager was unresponsive to requests for assistance, (5) ensure monitoring results are distributed to internal and external stakeholders with relevant interest, (6) expand the scope of other OM reviews when serious noncompliance issues are identified, (7) conduct compliance monitoring visits of new grantees to ensure they are operating grants in accordance with AmeriCorps terms and conditions, (8) develop a strategy and mechanisms to inform grantees and stakeholders of common problems identified during monitoring visits, (9) review nepotism and conflict of interest policies to determine whether AmeriCorps should prohibit grantees from recruiting volunteers with close familial or financial relationships with grantee staff and/or require disclosure of such relationships, (10) review and make any necessary updates to the RSVP Operations Manual and training materials to determine whether they provide sufficient guidance and sample documentation, and (11) require claimants and grantees to sign any mileage reimbursement request documents.

Agency/Administrative Actions

AmeriCorps responded that it would not be moving forward with disallowing any costs or expanding the scope of its monitoring since after it had notified RSVP-VIS of the decision to not further fund the organization's grant, RSVP-VIS dissolved and was no longer in operation.

Regarding the Executive Director's claims of unresponsiveness on the part of the AmeriCorps Portfolio Manager, AmeriCorps responded that the employee in question was no longer with AmeriCorps, but all grantees have access to other AmeriCorps staff and therefore have recourse through the supervisory structure. In addition, the AmeriCorps Mountain Region leadership directly extended an invitation to the grantee to attend multiple all-grantee calls, and grantees have direct access to a suite of materials designed to provide asynchronous support to new projects.

In response to the recommendation to distribute monitoring results to internal and external stakeholders, AmeriCorps wrote that the results are currently distributed and available to AmeriCorps staff via an internal system and various communications, and that OM would make all grantee record folders on its internal SharePoint available to department heads and deputies.

AmeriCorps disagreed with the recommendation to expand the scope of its monitoring activities when noncompliance issues are identified. OM monitors compliance and focuses on corrective action during a given assessment period. Going forward, OM will issue Recommendations for Improvement to direct grantees to identify the full scope of an issue's impact outside of the discrete period under review and to take the necessary corrective action, including the return of funds.

In response to the recommendation to conduct monitoring visits of new grantees, AmeriCorps stated that its monitoring plan development is risk-based, and while an organization not having previous AmeriCorps grant funding may affect its risk assessment, decisions to conduct monitoring activities are not made solely based on the length of time that a project has been receiving funds. AmeriCorps added that it has invested heavily in developing the training resources available to all grantees via its online training platform.

AmeriCorps agreed with the recommendation to inform grantees and program offices of common problems found during monitoring activities. OM makes internal offices aware of monitoring outcomes through an internal system, presents common findings at grantee convenings, and intends to post common findings on the AmeriCorps website and update it semi-annually.

Regarding nepotism and conflict of interest policies, AmeriCorps responded that AmeriCorps Seniors does not prohibit family members from volunteering, but guidance is provided in the terms and conditions and in program regulations on family members serving on paid or leadership positions. While family members serving is not prohibited, it is considered a best practice for family members not to serve as volunteers when they are related to staff members.

In response to the recommendation to review and make any necessary updates to the RSVP Operations Manual and training materials, AmeriCorps replied that the AmeriCorps Seniors website includes the RSVP Program Handbook, which includes program regulations, best practices, sample forms, and other useful tools. That document is updated as needed, typically quarterly but at least annually. The RSVP website also posts critical program management announcements and tools for grantees, including a monthly newsletter with reporting due dates, training opportunities, and other information.

Finally, AmeriCorps responded to the recommendation to require claimants and grantees to sign mileage reimbursement requests by stating that the RSVP Program Handbook includes guidance on mileage reimbursement and that grantees are required to follow all requirements outlined in RSVP regulations and 2 CFR.

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