Office of Inspector General Corporation for National and Community Service

AUDIT OF CORPORATION FOR NATIONAL AND COMMUNITY SERVICE GRANTS AWARDED TO U.S. COMMITTEE FOR REFUGEES AND IMMIGRANTS

OIG REPORT NUMBER 11-05





1201 New York Ave., NW Sutie 830 Washington, DC 20525 (202) 606-9390

This report was issued to Corporation management on November 24, 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 May 23, 2011, and complete its corrective actions by November 23, 2011. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.



OFFICE OF INSPECTOR GENERAL

November 24, 2010

TO: Margaret Rosenberry, Director, Office of Grants Management

FROM: Stuart Axenfeld, Assistant Inspector General for Audit

SUBJECT: OIG Report 11-05, Audit of Corporation for National and Community

Service AmeriCorps Grants Awarded to U.S. Committee for Refugees and

Immigrants (USCRI).

Attached is the final report for the above-noted OIG audit of AmeriCorps grants awarded to USCRI. This audit was performed by OIG staff in accordance with generally accepted government auditing standards.

The purpose of this audit was to determine whether USCRI had adequate procedures and controls that were in compliance with Federal laws, regulations and award conditions.

Under the Corporation's audit resolution policy, a final management decision on the findings in this report is due by May 23, 2011. Notice of final action is due by November 23, 2011. If you have any questions pertaining to this report, please contact me at (202) 606-9360, or Richard Samson, Audit Manager, at (202) 606-9380.

Enclosure

cc: Lavinia Limon, USCRI CEO

Lee Williams, USCRI CFO

Kristin McSwain, Chief of Program Operations

John Gomperts, Director, AmeriCorps State and National

William Anderson, Chief Financial Officer

Rocco Gaudio, Deputy Chief Financial Officer, Grants and FFMC

Claire Moreno, Audit Liaison, Office of Grants Management

Bridgette Roy, Administrative Assistant

OFFICE OF INSPECTOR GENERAL AUDIT OF

CORPORATION FOR NATIONAL AND COMMUNITY SERVICE **GRANTS AWARDED TO**

U.S. COMMITTEE FOR REFUGEES AND IMMIGRANTS

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EXECUTIVE SUMMARY

The Office of Inspector General (OIG), Corporation for National and Community Service (Corporation), performed an audit of AmeriCorps grants awarded to U.S. Committee for Refugees and Immigrants (USCRI). The purpose of the audit was to determine whether USCRI was in compliance with applicable laws, regulations, and terms and conditions of the grants.

SUMMARY OF RESULTS

We found the following areas in which AmeriCorps program requirements were not met by USCRI:

- 1. Member service hours did not meet the minimum amount required to receive an education award;
- 2. Member timesheets were not signed by the member and/or site supervisor;
- 3. Proper citizenship documentation was not maintained in member files; and
- 4. Compelling personal circumstances were not properly documented in member files.

SUMMARY OF QUESTIONED COSTS

Finding	Questioned Costs	Questioned Ed Awards	Questioned Accrued Interest
1	-	\$179,550	\$8,054
2	-	9,450	-
3	\$35,043*	9,450	-
4	-	2,982	-
Total	\$35,043*	\$201,432	\$8,054

^{*\$35,043 (}Federal Share) and \$6,184 (Grantee Share) equal \$41,227 (Amount questioned in Finding No. 3)

RESULTS OF AUDIT

1. AmeriCorps member service hours did not meet the minimum amount required to receive an education award.

During the audit period, we reviewed 99 AmeriCorps member files in program years 2006-2007, 2005-2006, and 2004-2005. A review of timesheets showed that 38 of the 99 AmeriCorps members did not have the required amount of service hours to receive an education award. These 38 members were full-time, and therefore, were required to serve at least 1,700 hours to receive an award. Actual hours per timesheets did not support the required 1,700 service hours for educational awards earned by 38 full-time members, as follows:

Program Year	Member Number	eSPAN Hours	Timesheet Hours	Education Award	Accrued Interest
2006-2007	1	1,714	1,498	\$ 4,725	\$ 752
2006-2007	2	1,717	1,578	4,725	-

Program	Member	eSPAN	Timesheet	Education	Accrued
Year	Number	Hours	Hours	Award	Interest
2006-2007	3	1,707	1,622	4,725	274
2006-2007	4	1,740	1,662	4,725	2,309
2006-2007	5	1,740	1,221	4,725	1,551
2006-2007	6	1,722	1,546	4,725	-
2006-2007	7	1,715	1,668	4,725	-
2006-2007	8	1,702	1,567	4,725	188
2006-2007	9	1,753	1,545	4,725	-
2006-2007	10	1,707	1,635	4,725	-
2006-2007	12	1,700	1,613	4,725	-
2006-2007	15	1,752	1,600	4,725	-
2006-2007	17	1,896	1,280	4,725	-
2006-2007	19	1,706	1,680	4,725	-
2006-2007	20	1,713	1,667	4,725	-
2006-2007	22	1,705	1,685	4,725	198
2006-2007	23	1,700	1,522	4,725	-
2006-2007	24	1,700	1,556	4,725	794
2006-2007	25	1,700	1,577	4,725	-
2006-2007	26	1,705	1,490	4,725	866
2006-2007	27	1,701	1,688	4,725	-
2006-2007	29	1,708	1,640	4,725	-
2006-2007	31	1,701	437	4,725	-
2006-2007	32	1,709	645	4,725	-
2006-2007	33	1,701	1,071	4,725	-
2005-2006	35	1,710	1,679	4,725	-
2005-2006	55	1,702	1,694	4,725	-
2005-2006	67	1,703	1,667	4,725	205
2004-2005	69	1,700	1,618	4,725	391
2004-2005	71	1,704	1,688	4,725	325
2004-2005	72	1,758	1,684	4,725	201
2004-2005	75	1,706	1,697	4,725	<u> </u>
2004-2005	77	1,700	1,694	4,725	-
2004-2005	79	1,701	1,621	4,725	_
2004-2005	84	1,733	1,698	4,725	-
2004-2005	87	1,714	1,637	4,725	_
2004-2005	94	1,711	1,639	4,725	_
2004-2005	96	1,757	1,656	4,725	_
Total		- , - • -	-,,,,,,	\$179,550	\$8,054

Criteria

45 CFR § 2527.10, What is the amount of an AmeriCorps education award?, states:

- (a) Full-time term of service. The education award for a full-time term of service of at least 1,700 hours is \$4,725.
- (b) Part-time term of service. The education award for a part-time term of service of at least 900 hours is \$2,362.50.
- (c) Reduced part-time term of service. The education award for a reduced part-time term of service of fewer than 900 hours is--

- (1) An amount equal to the product of--
 - (i) The number of hours of service required to complete the reduced part-time term of service divided by 900; and
 - (ii) 2,362.50; or
- (2) An amount as determined otherwise by the Corporation.

45 CFR § 2529.10 (a) *Eligibility, states:* "The Corporation will pay interest that accrues on an individual's qualified student loan, subject to the limitation on amount in paragraph (b) of this section, if (1) The individual successfully completes a term of service in an approved AmeriCorps position."

2004 AmeriCorps Provisions, Section B. *AmeriCorps Special Provisions*, Part 12. *Post-Service Education Awards*, states:

In order for a member to receive a post-service education award from the National Service Trust, the Grantee must certify to the National Service Trust that the member is eligible to receive the education benefit. The Grantee must notify the National Service Trust on a form provided by the Corporation (electronic submission via WBRS suffices) when it enrolls a member for a term of service, when the member completes the term, and whenever there is a change in the member's status during the term (e.g., release for compelling circumstances or suspension). A member may receive a post-service education award only for the first two terms of service. For example, one full-time and on half-time term of service count as two terms. If a member is released for reasons other than misconduct prior to completing 15% of a term of service, that term does not count as one of the two terms for which an education award may be provided. No Corporation or other federal funds may be used to provide member support costs for a third or subsequent term of service in an AmeriCorps State or National Program.

2004 AmeriCorps Provisions, Section B. *AmeriCorps Special Provisions*, Part 22.c. *Time and Attendance Records*, states:

AmeriCorps Members. The Grantee must keep time and attendance records on all AmeriCorps members in order to document their eligibility for in-service and post-service benefits. Time and attendance records must be signed and dated both by the member and by an individual with oversight responsibilities for the member.

USCRI stated that it did not verify members' hours by reviewing timesheets, but instead reviewed the time and attendance database on the Corporation's Web-Based Reporting System (WBRS). Members would input their hours into WBRS, which subsequently, were approved by their on-site supervisor.

We question the 38 members' education awards of \$179,550. We also question the 12 members' accrued interest awards totaling \$8,054. The total amount questioned is \$187,604.

Recommendation

1. We recommend that the Corporation recover the questioned education awards and accrued interest of \$187,604.

USCRI's Response

USCRI did not concur with the recommendation to recover the questioned education awards and accrued interest of \$187,604. USCRI subsequently identified and provided, to the Corporation, additional timesheets for 10 of the 38 members questioned. USCRI is currently working to identify timesheets for the remaining 28 members.

Corporation's Response

The Corporation will work with the grantee to develop corrective actions and will also respond to findings and recommendations in its management decision.

OIG Comments

USCRI submitted additional timesheets to the Corporation. The subsequent timesheets were not reviewed by the OIG. The Corporation should work with USCRI and the OIG to resolve any issues during the audit resolution process.

2. Member timesheets were not signed by the member and/or site supervisor.

Timesheets were reviewed for 99 AmeriCorps members during program years 2006-2007, 2005-2006, and 2004-2005. Timesheets were not signed by the AmeriCorps member and/or the site supervisor for 13 of the 99 AmeriCorps member timesheets we reviewed, as follows:

Program Year	Member Number	Unsigned Timesheet (Member)	Unsigned Timesheet (Supervisor)	Education Award
2006-2007	15*	8	8	-
2006-2007	16**	-	1	-
2006-2007	17*	1	1	-
2006-2007	19*	-	1	-
2006-2007	29*	-	1	-
2006-2007	32*	1	-	-
2006-2007	33*	-	1	-
2004-2005	72*	-	1	-
2004-2005	76	-	1	\$4,725
2004-2005	83**	-	1	-
2004-2005	84*	2	3	-
2004-2005	85	1	-	4,725
2004-2005	96*	-	1	-
Total				\$9,450

^{*}Member's education award was questioned in Finding No. 1 above.

^{**}Member met required minimum service hours.

Criteria

2004 AmeriCorps Provisions, Section B. *AmeriCorps Special Provisions*, Part 22.c. *Time and Attendance Records*, states:

AmeriCorps Members. The Grantee must keep time and attendance records on all AmeriCorps members in order to document their eligibility for in-service and post-service benefits. Time and attendance records must be signed and dated both by the member and by an individual with oversight responsibilities for the member.

Without signed timesheets by the AmeriCorps member and/or site supervisor, the potential exists for inaccurate timesheets to be recorded that may result in improper payments of education awards. We did not question nine of 13 members' education awards because those awards were previously questioned in Finding No. 1 above. However, we will question any of the nine AmeriCorps members' education awards in this finding if these AmeriCorps members' education awards are subsequently allowed under Finding No. 1. Also, we did not question 2 of the 13 members' education awards because they still met the required minimum service hours, even after reducing the hours from the unsigned timesheets. We question the remaining two members' education awards totaling \$9,450. These AmeriCorps members were short of the requirement by 23 and 6 service hours, respectively.

Recommendation

2. We recommend that the Corporation recover the questioned education awards of \$9,450.

USCRI's Response

USCRI does not concur with the recommendation to recover the questioned education awards of \$9,450. USCRI stated that, although timesheets were not signed, the service hours were entered on the paper timesheets and submitted for payment. Also, member hours were entered into WBRS by the AmeriCorps members and approved by the on-site manager.

Corporation's Response

The Corporation will work with the grantee to develop corrective actions and will also respond to findings and recommendations in its management decision.

OIG Comments

We recommend that the Corporation recover the questioned costs.

3. Proper citizenship documentation was not maintained in member files.

Member files were reviewed for 99 AmeriCorps members during program years 2006-2007, 2005-2006, and 2004-2005. Proper citizenship documentation was not maintained for four of the 99 members reviewed, as follows:

Program Year	Member Number	Living Allowance & Related Fringe Benefits	Education Award	Accrued Interest
2004-2005	86	11,995	4,725	
2004-2005	87*	11,057	-	-
2004-2005	95	6,441	4,725	
2004-2005	96*	11,734	-	-
Total		\$41,227**	\$9,450	-

^{*}Member's education award was questioned in Finding No. 1.

Criteria

45 CFR § 2522.200, Section a. *Eligibility*, Part 3, states: "An AmeriCorps participant must be a citizen, national, or lawful permanent resident alien of the United States."

45 CFR § 2522.200, Section c. Primary documentation of status as a U.S. citizen or national, states:

The following are acceptable forms of certifying status as a U.S. citizen or national:

- A 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 Mariana Islands;
- 2. A United States passport;
- 3. A report of birth abroad of a U.S. Citizen (FS-240) issued by the State Department;
- 4. A certificate of birth-foreign service (FS-545) issued by the State Department;
- 5. A certificate of report of birth (DS-1350) issued by the State Department;
- 6. A certificate of naturalization (Form N-550 or N-570) issued by the Immigration and Naturalization Service.
- 7. A certificate of citizenship (Form N-560 or N-561) issued by the Immigration and Naturalization Service.

45 CFR § 2522.200, Section d. Primary documentation of status as a lawful permanent resident alien of the United States, states:

- 1. Permanent Resident Card, INS Form I-551;
- 2. Alien Registration Receipt Card, INS Form I-551;

^{**\$35,043 (}Federal Share) and \$6,184 (Grantee Share)

- 3. A passport indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence; or
- 4. A Departure Record (INS Form I-94) indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence.

45 CFR § 2522.200, Section e. Secondary documentation of citizenship or immigration status, states: "If primary documentation is not available, the program must obtain written approval from the Corporation that other documentation is sufficient to demonstrate the individual's status as a U.S. citizen, U.S. national, or lawful permanent resident alien."

Participants lacking proper citizenship documentation are ineligible to receive living allowances and education awards. We question all four AmeriCorps members' living allowance and related fringe benefits of \$41,227 (\$35,043—Federal Share and \$6,184—Grantee Share). We also question two AmeriCorps members' education awards of \$4,725 each, which totals \$9,450. The other two AmeriCorps members' education awards were not questioned in this finding because their education awards were previously questioned in Finding No. 1. However, we will question the two AmeriCorps members' education awards in this finding if these awards are subsequently allowed under Finding No. 1.

Recommendation

3. We recommend that the Corporation recover the questioned living allowance and related fringe benefits of \$35,043 and education awards of \$9,450.

USCRI's Response

USCRI does not concur with the audit recommendation to recover questioned costs. USCRI subsequently provided proper citizenship documentation for 26 of the 31 AmeriCorps members whose status was originally questioned in the draft report. (Citizenship documentation was provided for one additional member after USCRI's response to the draft report, bringing the total to 27.) USCRI will continue to attempt to obtain proper citizenship documentation for the remaining five members.

Corporation's Response

The Corporation will work with the grantee to develop corrective actions and will also respond to findings and recommendations in its management decision.

OIG Comments

This report has been revised since being issued in its draft form. USCRI subsequently provided citizenship documentation for 27 of the 31 AmeriCorps members originally questioned. We reviewed this documentation and determined it was in compliance with the grant provisions. We recommend that the Corporation recover the remaining questioned costs.

4. Compelling personal circumstances were not properly documented in member files.

Two of the 99 AmeriCorps members reviewed during program years 2006-2007, 2005-2006, and 2004-2005, received partial education awards. USCRI exited both members from the program due to compelling personal circumstances and awarded partial awards to the members. However, for the one member who exited early during program year 2005-2006, USCRI did not document the for compelling personal circumstances, as required

Criteria

45 § CFR 2522.230, Under what circumstances may AmeriCorps participants be released from completing a term of service, and what are the consequences?, states:

An AmeriCorps program may release a participant from completing a term of service for compelling personal circumstances as demonstrated by the participant, or for cause.

- a. Release for compelling personal circumstances.
 - 1. An AmeriCorps program may release a participant upon a determination by the program, consistent with the criteria listed in paragraphs (a)(5) through (a)(6) of this section, that the participant is unable to complete the term of service because of compelling personal circumstances.
 - 2. A participant who is released for compelling personal circumstances and who completes at least 15 percent of the required term of service is eligible for a pro-rated education award.
 - 3. The participant has the primary responsibility for demonstrating that compelling personal circumstances prevent the participant from completing the term of service.
 - 4. The program must document the basis for any determination that compelling personal circumstances prevent a participant from completing a term of service.

We question the AmeriCorps member's partial education award of \$2,982.

Recommendation

4. We recommend that the Corporation recover the questioned education award of \$2,982.

USCRI's Response

USCRI does not concur with the audit recommendation to recover the questioned education award of \$2,982. USCRI stated that compelling personal circumstances were not fully documented because of the confidential nature of the member's situation.

Corporation's Response

The Corporation will work with the grantee to develop corrective actions and will also respond to findings and recommendations in its management decision.

OIG Comments

We recommend that the Corporation recover the questioned costs.

AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

The objectives of the audit were to determine whether USCRI was in compliance with terms of the grant and applicable laws and regulations related to member eligibility and terms of service.

The scope of this audit included the AmeriCorps Grant for program years 2004-2005, 2005-2006, and 2006-2007:

Program	Award No.	Audit Period	Program Year	No. of Volunteers	Volunteers in Audit Scope
			2004-2005	32	32
AmeriCorps	04NDHDC005	09/08/04 - 09/01/08	2005-2006	34	34
			2006-2007	38	33
Totals				104	99

We conducted our audit in accordance with audit standards generally accepted in the United States of America and generally accepted government audit standards. We did not test internal controls and do not express an opinion on them. USCRI has not had a grant from the Corporation since September 30, 2008.

We conducted our field work from May 2010 to June 2010.

BACKGROUND

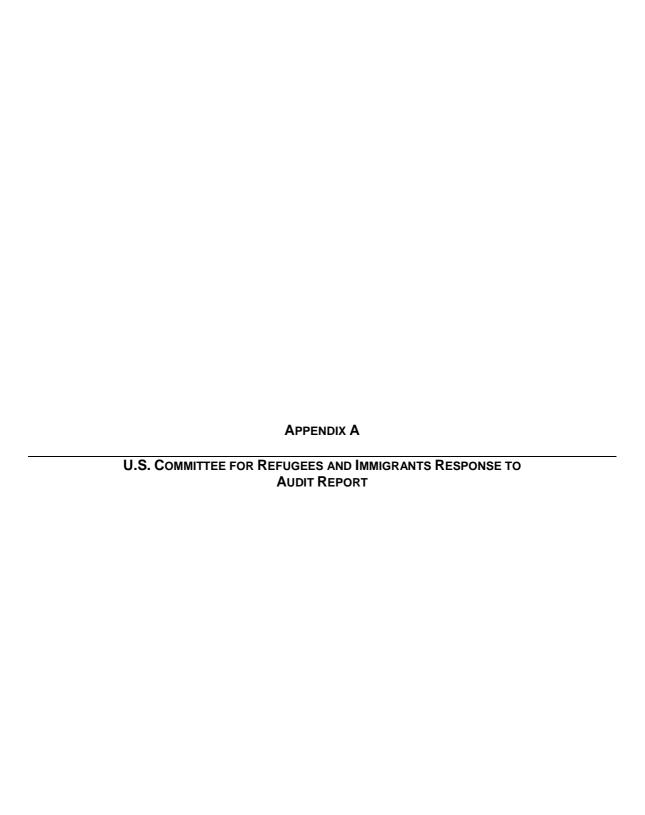
The Corporation awards grants to assist in the creation of full-time and part-time national and local community service programs. AmeriCorps is one of the Corporation's three major service initiatives. The Corporation's AmeriCorps program provides grants to qualified organizations to engage persons age 17 and older in programs that address educational, public safety, human, or environmental needs through national and community service, and provides education awards to participants who successfully complete their service.

USCRI is a non-profit refugee resettlement, immigrant service, and public education organization founded in 1911. Individuals serving in USCRI's AmeriCorps program participated in service projects and activities to increase naturalization rates among select immigrant groups, foster civic pride, mobilize volunteers, and utilize the volunteer experience of baby boomers and older Americans to engage refugees and immigrants in their communities.

EXIT CONFERENCE

The contents of this report were discussed with USCRI's management and the Corporation at an exit conference held on September 16, 2010. In addition, a draft of this report was provided to USCRI and the Corporation for their comments on October 5, 2010. We summarized their comments in the appropriate sections of this report, and included their complete comments in Appendices A and B.

This report is intended solely for the use of the management of the Corporation, OIG, USCRI, and U.S. Congress and is not intended to be and should not be used by anyone other than these specified parties. However, the report is a matter of public record and its distribution is not limited.





November 4, 2010

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USCRI FIELD OFFICES Albany, NY Colchester, VT Detroit, MI Erie, PA Port-au-Prince, Haiti Raleigh, NC Mr. Stuart Axenfield
Assistant Inspector General for Audit
Office of Inspector General
Corporation for National & Community Service
1201 New York Avenue, NW
Suite NW
Washington, DC 20525

Dear Mr. Axenfield

Enclosed you will find a response by U.S. Committee for Refugee and Immigrants (USCRI) to the draft report on the results of the Office of Inspector General's audit of our AmeriCorps grants for program years 2004-205, 2005-2006, and 2006-2007.

If you have questions or wish to discuss the draft report, please contact Lee Williams, Vice President and CFO, at (703) 310-1130, ext, 3032 and lwilliams@uscridc.org.

Sincerely,

Lavinia Limón

President and CEO

USCRI's Response to Office of Inspector General's Draft Audit Report

USCRI responses to the results of the audit conducted by the Office of Inspector General (OIG) of the Corporation for National and Community Service (Corporation) are contained below.

AmeriCorps member service hours did not meet the minimum required to receive an educational award.

USCRI disagrees with the OIG's recommendation to recover the questioned education awards and accrued interest award of \$187,604. The OIG audit found that timesheets for 38 of the 99 AmeriCorps members did not meet document the required amount of service hours to receive an educational award. USCRI identified 10 of the 38 members with a total amount of \$50,735 in education awards and accrued interest award. USCRI subsequently provided additional timesheets totaling 1,700 hours for the AmeriCorps members listed below.

- #4 1,707.25
- #5 1,748.75
- #6 1,718
- #9 1,712
- #19 1,752,50
- #24 1,700.48
- #25 1,700
- #26 1,706.65
- #27 1,701.50
- #94 1,720

These recently located timesheets account for a total of \$50,735 in education awards and accrued interest which should be subtracted from the questioned education awards and accrued interest award of \$187,604. USCRI is currently working to identify timesheets for the remaining 28 members and will provide the information to the Corporation.

USCRI relied on the Corporation's WBRS system because it had a check and balance system to verify AmeriCorps service hours. We do not believe that the paper timesheet should be the determining factor in ascertaining a member's participation and eligibility for benefits. Rather, we believe that the WBRS system, which requires input of hours by the member and approval by the on-site manager, should be sufficient proof of participation.

2. Member timesheets were not signed by the member and/or site supervisor.

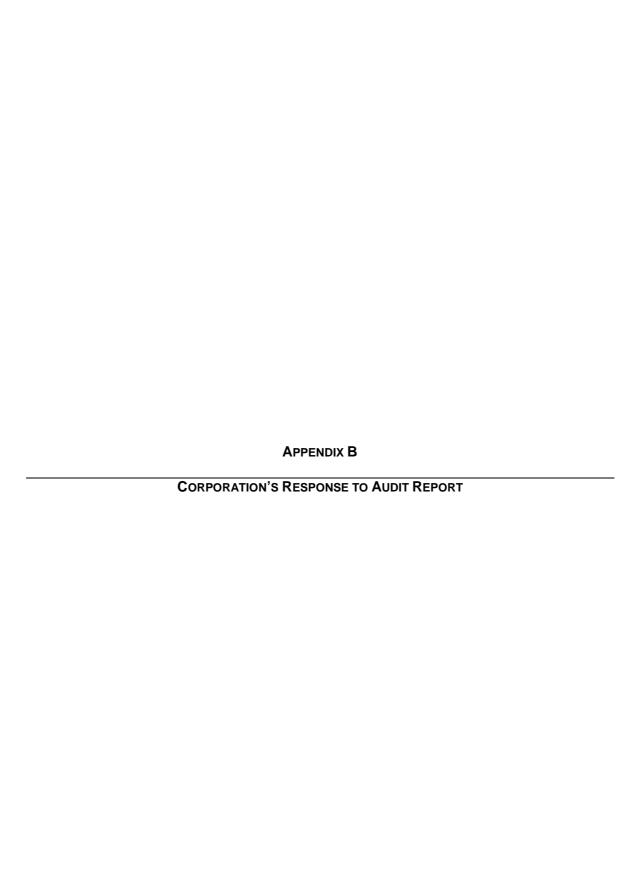
USCRI disagrees with the OIG's recommendation to recover the questioned education awards of \$9,450. The OIG audit found that timesheets were not signed by the AmeriCorps member and/or site supervisor for 13 of the 99 AmeriCorps members reviewed. Although timesheets were not signed, timesheet hours were entered on the paper timesheets and submitted for payment. Further, the same information was entered into the WBRS system which required input of hours by the member and approval by the on-site manager. There is clearly no attempt to circumvent any rules or procedures but amounts to a clerical oversight and both the paper timesheets and the WBRS information demonstrates USCRI's effort to meet its contractual obligation. USCRI would hope that the Corporation would not seek to recover \$9,450 for this minor, clerical oversight.

3. Proper member eligibility documentation was not maintained in member files.

USCRI disagrees with the OIG's recommendation to recover the questioned living allowance and related fringe benefits of \$298,498, education awards of \$85,050, and accrued interest of \$425. The OIG audit found that proper citizenship documentation was not maintained for 31 of the 99 AmeriCorps members reviewed. USCRI subsequently provided documentation for 26 of the 31 AmeriCorps members: #35, #36, #41, #42, #43, #51, #52, #54, #58, #69, #71, #72, #74, #78, #79, #81, #82, #84, #85, #88, #89, #93, #94, #95, #97, and #99. The documentation for these members represents a total amount of \$112,677 in living allowance and fringe benefits, \$23,625 in education awards, and \$425 in accrued interest which should be subtracted from the questioned living allowance and related fringe benefits, education awards, and accrued interest. USCRI is currently working to identify documentation for the remaining 5 members and will provide the information to the Corporation.

4. Compelling personal circumstances were not properly documented in member files.

USCRI disagrees with the OIG's recommendation to recover the questioned education award of \$2,982. The OIG audit found that one AmeriCorps member who exited early during program year 2005-2006 did not document the compelling personal circumstances as required by 45 Section CFR 2455.230. USCRI provided a copy of a letter dated May 23, 2006 as documentation of the compelling personal circumstances for AmeriCorps member #57. The nature of the member's compelling personal circumstances was confidential. A judgment was made not to force the member to document the events she had a right to keep confidential. USCRI would hope that the Corporation would respect the member's right to confidentiality and not seek to recover \$2,982.





To: Stuart Axenfeld, Assistant Inspector General for Audit

From: Margaret Rosenberry, Director of Grants Management

Cc: William Anderson, Chief Financial Officer

Rocco Gaudio, Deputy CFO, Grants and Field Financial Management

John Gomperts, Director AmeriCorps*State and National Heather Johnson Alarcon, Assistant General Counsel

Bridgette Roy, CFO, Administrative Assistant

Date: October 20, 2010

Subj: Response to OIG Draft of Agreed-Upon Procedures of Corporation Grants

Awarded to the U.S. Committee for Refugees and Immigrants (USCRI)

Thank you for the opportunity to review the draft Agreed-Upon Procedures report of the 'Corporation's grants awarded to the U.S. Committee for Refugees and Immigrants (USCRI). We will work with the grantee to develop corrective actions. We will respond to all findings and recommendations in our management decision when the audit working papers are provided and the final audit is issued.