

# CORPORATION FOR NATIONAL & COMMUNITY SERVICE

## OFFICE OF INSPECTOR GENERAL

### VISTA Program Evaluation

### OIG Report 18-12

Prepared by:

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This report was issued to Corporation management on September 11, 2018. 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 March 11, 2019, and complete its corrective actions by September 11, 2019. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.



September 11, 2018

TO: Eileen Conoboy  
Acting Director, AmeriCorps VISTA

FROM: Carol Bates /s/  
Acting Assistant Inspector General for Audit

SUBJECT: Office of Inspector General (OIG) Final Presentation Report 18-12:  
VISTA Program Evaluation

Attached is the OIG Final Presentation Report 18-12: *VISTA Program Evaluation*. We contracted with MorganFranklin Consulting to conduct this evaluation.

Under the Corporation's audit resolution policy, a final management decision on the findings and recommendations in this report is due by March 11, 2019. Notice of final action is due by September 11, 2019.

If you have questions pertaining to this report, please contact Thomas Chin, Audit Manager, at (202) 606-9362 or [t.chin@cncsoig.gov](mailto:t.chin@cncsoig.gov); or me at (202) 579-7900 or [c.bates@cncsoig.gov](mailto:c.bates@cncsoig.gov).

#### Attachment

cc: Barbara Stewart, Chief Executive Officer  
Desiree Tucker-Sorini, Chief of Staff  
Tim Noelker, General Counsel  
Kim Mansaray, Chief of Program Operations  
Stephanie Wrightsman, Acting Deputy Director, AmeriCorps VISTA  
Lori Giblin, Chief Risk Officer  
Lora Pollari-Welbes, Audits and Investigations Program Manager

# Corporation for National and Community Service (CNCS) VISTA Program Evaluation

September 11, 2018  
Final Presentation Report

*Corporation for*  
NATIONAL &  
COMMUNITY  
SERVICE 

# VISTA Evaluation Executive Summary

In our evaluation of the VISTA Program, we reviewed documentation and interviewed VISTA sponsors and VISTA members to assess the effectiveness of the VISTA program with a focus on member activity, project sustainability, and member attrition.

We made 11 summary-level recommendations and identified the following issues concerning the effectiveness of the VISTA program:

- Documentation maintained during execution of a project is prepared at the program level and does not contain sufficient detail to validate that member activities are consistent with program purposes or are the same as the planned activities.
- Through interviews with 27 former organizations, we found that project activities did not build capacity or enable projects to be fully sustained following VISTA support in 12 instances (4 projects that did not build capacity, 8 projects that were unable to be sustained).
- The VISTA program had an attrition rate of 16.8 percent in the time period evaluated (FY 2014 – 2015), with the primary causes of turnover identified as other employment / financial hardship (80 percent), dissatisfaction with the program (15 percent), and medical issues (5 percent).

# VISTA Evaluation Executive Summary

While we noted concerns regarding the VISTA program, we also observed the following program highlights:

- VISTA sponsors identified several best practices which they believe attributed to a reduced amount of turnover within their organization:
  - Provide professional development opportunities aside from onsite orientation (i.e. trainings for skills related to the VISTA members' desired careers).
  - Provide VISTA members the same access, level of responsibility, and voice as paid sponsor organization staff.
  - Provide frequent interaction with the sponsor supervisor to increase VISTA members' engagement and focus during service.
  - Provide a list of available financial resources online and within the community to help VISTA members live within the means of the program.
- VISTA member support made impact on the organizations they support, such as:
  - Build a nationally endorsed training system for literacy instructors.
  - Develop expansion and family engagement in college access for secondary education programs.
  - Raise funds through in kind donations that VISTA members organized.

# VISTA Evaluation Results – Objective 1

Objective 1	Issues Identified
<p data-bbox="50 328 588 928"><b>Determine, using statistical sampling on a program-wide scale, whether and to what extent VISTA members perform services which are not consistent with the program purposes (activities not directed at capacity-building or alleviation of poverty).</b></p> <p data-bbox="50 1010 499 1052"><b>Scope: FY2014 – FY2015</b></p>	<p data-bbox="625 328 2032 555"><b>Documentation maintained during execution of a project is prepared at the program level and does not contain sufficient detail to validate that member activities are consistent with program purposes or are the same as the planned activities.</b></p> <p data-bbox="625 636 2045 1172">CNCS VISTA lacks a standard process and internal controls for monitoring project progress and member activity resulting in the failure to detect member misuse and mismanagement of federal resources. Documentation recommended for analysis and provided by VISTA was insufficient, and in some cases unavailable, to demonstrate that the services performed by VISTA members are consistent with the program purposes. While planned member activity is documented prior to project implementation, there is no corresponding documentation prepared to show members' actual activities, and thus no way to compare the two.</p> <p data-bbox="625 1253 2016 1481">Project progress reports and limited interviews with former members found some instances of direct service, but not sufficient to establish the extent of those activities or their presence in the sampled population. This prevented us from making a statistical determination on a on a program-wide scale.</p>

# VISTA Evaluation Results – Objective 1, continued

In our evaluation of objective 1, we reviewed documentation (PPRs, VISTA Activity Descriptions (VAD), Project/Grant Applications, and Monitoring Reports) and interviewed VISTA members to obtain insight of member activity. We identified the following issues with member activity:

- One instance of a member performing direct service.
- Three instances of direct service performed identified on progress reports that related to samples selected; however, the direct service was not attributed to the sampled member so additional follow up was not performed.
- Two instances of direct service performed identified on progress reports that related to samples selected, but we were unable to determine if it was attributed to the sampled member and if the direct service was appropriate. The sampled members did not respond to requests for follow-up information.

# VISTA Evaluation Results – Objective 2

Objective 2	Issues Identified
<p data-bbox="50 295 617 1214"><b>Determine, using statistical sampling on a program-wide scale, whether and to what extent selected VISTA programs enhance the capabilities of the sponsoring organizations and/or the communities they serve in the short term and long term, and the impact of such enhanced capabilities, and whether VISTA support helps those programs to become sustainable without VISTA support.</b></p> <p data-bbox="50 1295 617 1333"><b>Scope: FY2010 – FY2015</b></p>	<p data-bbox="625 295 2045 597"><b>According to former sponsor organizations, 44 percent of projects reviewed were unsuccessful at enhancing capacity or were unsustainable without VISTA support.</b> We interviewed 27 former sponsor organizations and identified 12 projects that either did not build capacity at the organization or in the community, or were not sustained once VISTA member support ended.</p> <p data-bbox="625 669 2045 1091">Despite the lack of historical performance measurement data that prevented us from drawing a statistical conclusion, a significantly high percent of our selected projects were unsustainable and this is concerning. CNCS VISTA implemented required performance measures around both day-to-day project outputs and overall outcomes (over life of the project) in Fiscal Year (FY) 2013; however, there is not enough data at this point to draw a conclusion on capability enhancement and sustainability.</p>

# VISTA Evaluation Results – Objective 2, continued

We interviewed 27 former sponsor organizations and identified 12 VISTA projects that either did not build capacity or were not sustainable\* once VISTA member support ended. Specifically:

- Two projects did not build capacity as members performed largely direct service activities.
- Two projects did not build capacity and were ultimately closed due to the inability to recruit VISTA members.
- Eight projects were not sustainable once VISTA member support ended.

\*For purposes of this evaluation, project sustainability was defined as continuation at full capacity once VISTA member support ended.

# VISTA Evaluation Results – Objective 3

Objective 3	Issues Identified
<p data-bbox="50 302 730 651"><b>Evaluate the VISTA member turnover circumstances, determine root cause of turnover, evaluate the appropriateness of prior corrective actions, and recommend steps to reduce turnover.</b></p> <p data-bbox="50 737 499 776"><b>Scope: FY2014 – FY2015</b></p>	<p data-bbox="737 302 2053 529">In FY 2014-2015, CNCS VISTA recorded 2,419 early terminations from the VISTA program, an attrition rate of 16.8 percent. Based on documentation reviewed and interviews with former sponsors, the root primary causes of VISTA member turnover were identified as:</p> <ul data-bbox="737 548 2053 781" style="list-style-type: none"><li data-bbox="737 548 2053 651">• Other employment/financial hardship – 80 percent of early exits or 13.44 percent of VISTA enrollees</li><li data-bbox="737 670 2053 716">• Dissatisfaction with the VISTA program – 15 percent</li><li data-bbox="737 735 2053 781">• Medical issues – 5 percent</li></ul> <p data-bbox="737 862 2053 1024">VISTA staff indicated that corrective actions have not been taken specifically to address turnover; they believe, however, that several program improvements will collaterally improve the attrition rate.</p>

# VISTA Evaluation Results – Objective 4

Objective 4	Issues Identified
<p data-bbox="50 302 688 594"><b>Assess the impact on the VISTA program of the policy change that allowed VISTA members to take classes while they serve in the VISTA program.</b></p> <p data-bbox="50 675 499 711"><b>Scope: FY2014 – FY2015</b></p>	<p data-bbox="737 302 2022 464">We were unable to conclude on how the policy change impacts the VISTA program due to the lack of quantitative data on members taking classes while serving.</p>

# Recommendation #1

***CNCS VISTA should enhance the existing monitoring program to provide greater insight into member activity and program effectiveness. Specifically, CNCS VISTA should:***

1.1 Make enhancements and improvements to the data, information, and documents used to monitor VISTA projects and member activities to enable timely and effective oversight and monitoring.

1.2 Enhance VISTA's existing monitoring program to improve the effectiveness of monitoring activities.

# Recommendation 1.1

## ***Make enhancements and improvements to the data, information, and documents used to monitor VISTA projects and member activities to enable timely and effective oversight and monitoring***

- Enhance the PPR to include a member activity section where the sponsor organization provides a detailed progress description at the member level, so that CNCS VISTA can determine if members perform activities that are consistent with program purposes and reflected in VADs.
- Ensure that applications and VADs are up-to-date throughout the course of active VISTA projects, as projects are extended, and as members join and leave, to allow for effective monitoring of member activity.
- Review and improve the accuracy and completeness of data in eGrants related to projects and member activity prior to migration to the new Grant and Member Management (GMM) to ensure that the ability to monitor member activity and projects is not impacted by poor data quality.
- Create effective document management and retention procedures requiring that all documentation be housed in the information management system. Specific processes and procedures should include roles and responsibilities for maintaining documentation, and quality assurance checks to validate that requirements are followed.

# Recommendation 1.1, continued

- Implement a policy to improve monitoring of project documentation, including PPRs to ensure that program objectives are being met, VISTA members perform allowable activities, and progress towards sustainability is being achieved. The policy should include the following:
  - Communicate progress report deadlines to the sponsor based on the requirement within the assigned member's service period and follow up with sponsor organizations to ensure required reports are received.
  - Review submitted PPRs to ensure reported activities align with program purposes as outlined in the VAD and project application.
  - Approve PPRs electronically and provide a copy to the sponsor and VISTA program office once reviewed by the Program Officer.
  - Review the sponsor's proposed plan (see Recommendation 2) for achieving sustainability once VISTA resources are expired, and any subsequent modifications to the plan to ensure that sponsors make progress towards achieving sustainability.

# Recommendation 1.2

## ***Enhance VISTA's existing monitoring program to improve the effectiveness of monitoring activities.***

- Enhance the existing on-site monitoring process and add new steps in the monitoring tool to provide greater insight into member activity, specifically:
  - Modify the existing risk assessment process with assistance from the Office of the Chief Risk Officer (OCRO) whereby risk is assessed for each VISTA grant/project using program specific risk factors to determine the schedule of monitoring visits.
  - Ensure that all active projects are evaluated in the risk assessment and those which pose significant risk have at least one monitoring visit over the life of the project.
  - Enhance the standardized monitoring report for all monitoring visits indicating who the team met with, what was reviewed, potential risks identified, issues identified, and a list of any necessary corrective actions.
  - Require the review and validation of information reported in the PPR through inquiry, observation, or other procedures.
  - Require Program Officers to monitor any corrective actions identified for remediation no less than quarterly.

## Recommendation 1.2, continued

- Enhance the existing intermediary monitoring process requiring intermediaries to monitor host sites to encourage more frequent interaction and greater insight into member activity. Specifically,
  - Create new guidance that requires host sites be monitored by intermediaries at least annually through onsite visits or virtual site visits (web-based review), as determined in the risk assessment. Intermediary monitoring should evaluate whether organizations are compliant with the grant agreement, examine VISTA member activities, assess overall project progress, and follow up on any existing corrective actions.
  - Require intermediaries to complete monitoring reports, including any corrective actions, and provide to the host site and CSO and document in the eGrants/GMM within 60 days of the visit.

## Recommendation #2

***CNCS VISTA should develop a standard for capturing capacity building and measuring sustainability during and after the VISTA project is completed. Specifically, CNCS VISTA should:***

- Develop a definition and standard for sustainability to incorporate into VISTA policy.
- Require applicants to describe in their initial proposals a plan of how the project will be sustained after VISTA support ends. Require that sponsors continually assess the feasibility of the proposed plan throughout the duration of the project, and modify the planned approach for achieving sustainability as necessary.
- Include steps to assess project sustainability in the VISTA grant monitoring process tool.
- Survey former sponsors on the state of the projects after VISTA support ends to assess sustainability of projects and effectiveness of corrective actions taken to increase project sustainability.
- Develop a tool that would assist sponsors in developing a plan on how to best utilize VISTA support to promote enhanced capacity and project sustainability after VISTA member support ends.
- Continue collecting data on implemented performance measures and perform analysis on data collected to determine any needed adjustments to performance measures.

## Recommendation #3

***CNCS VISTA should strengthen the VISTA member experience to improve member retention. Specifically, CNCS VISTA should:***

- 3.1 Improve the quality, thoroughness, and availability of information available to VISTA recruits in order to provide sufficient understanding of the VISTA program and member expectations/responsibilities prior to the interview process.
- 3.2 Provide guidance and resources to the sponsors to improve the consistency of the member recruiting and interview process so that recruits are adequately informed of program goals and expectations.
- 3.3 VISTA must squarely address that financial considerations cause 13.44 percent of VISTA members to fail to complete their service terms.
- 3.4 Create and foster an enhanced sense of community and internal support among VISTA members.

## Recommendation 3.1

***Improve the quality, thoroughness, and availability of information available to VISTA recruits in order to provide sufficient understanding of the VISTA program and member expectations/responsibilities prior to the interview process.***

- Clearly identify and present core competencies of AmeriCorps State & National versus VISTA programs. This can be done through presenting accurate information, including engaging decision trees, quizzes, and/or infographics, about the VISTA program.
- Create a list of sponsors and their projects to provide recruits more insight on organizational information and project background. This could help members draw an early connection with VISTA's programming, while educating them on the type of work they will engage in as a VISTA.
- Provide recruits a detailed VAD regarding members' roles and duties prior to interviews, which allows them to be more informed in their decision while allowing sponsors to effectively assess whether recruits are a good fit with sponsors.
- Provide recruits with examples of personal VISTA member budgets to provide insight into the financial challenges that may be faced as a VISTA member.

## Recommendation 3.2

***The Corporation should provide guidance and resources to the sponsors to improve the consistency of the member recruiting and interview process so that recruits are adequately informed of program goals and expectations.***

- Sponsors should identify community organizations and activities to recruit from that are likely to engage highly motivated youths and families.
- Sponsors should increase awareness of the financial situation for VISTAs within the interview process, by engaging former VISTA members or leaders to lead interviews, provide cost of living data and discuss logistics of living situation, and determine if a potential member is a strong fit to the program.
- The Corporation should work with sponsors to offer VISTA members financial literacy tools and resources during the interview process to enable the VISTA member to make more informed financial decisions before their year of service.
- Create and provide training to sponsors on comprehensive interview/recruiting methodologies with applicable information to develop their recruitment strategy. This methodology should include a standard template for job description postings, standardized interview question examples, behavioral traits that will be successful in the VISTA program, and a timeline for successful recruiting.

## Recommendation 3.3

***VISTA must address the fact that financial considerations cause 13.44 percent of VISTA members to fail to complete their service terms. Specifically, VISTA should:***

- Better inform prospective members of the financial challenges associated with VISTA service.
- Develop a method to identify applicants who are prepared to live within the financial constraints.
- Involve sponsors and former members in developing tips and strategies to assist new members in managing their finances in their respective communities.
- Work with sponsor organizations to compile a list of community partners and resources available to VISTA members for financial and living support.
- Consider whether VISTA should propose decoupling the living stipend from the poverty level and supporting fewer members with an increased living allowance.

## Recommendation 3.4

***Create and foster an enhanced sense of community and internal support among VISTA members. Specifically,***

- Ensure that members are aware of and use specialized community forums/message boards on the VISTA Campus website. Keep VISTAs connected and engaged with members in their functional cohort throughout their service and leverage them for guidance and/or information sharing.
- Offer and facilitate the opportunity for VISTAs to build communities within their regions. For large urban areas and areas with more isolated VISTA sites, there should be a special emphasis on this for intermediaries as well; intermediaries should foster a community with VISTAs within their organizations.

## Recommendation #4

***CNCS VISTA should develop and implement a strategy for improving member retention. Specifically, CNCS should:***

4.1 Develop a comprehensive, risk-based member enrollment and retention strategy. This includes, but is not limited to, identifying the characteristics of individuals who are most likely to succeed in the VISTA program and developing interview techniques and application questions to identify applicants likely to complete their service terms successfully.

4.2 Improve member attrition and retention data collection/quality and implement consistently across all sponsor organizations.

4.3 Establish member enrollment and retention goals for each fiscal year.

## Recommendation 4.2

***Improve member attrition and retention data collection/quality and implement consistently across all sponsor organizations. Specifically,***

- Implement an information-based performance review methodology for VISTA members and sponsors. This system would allow the sponsor to rate the VISTA members, and the VISTA members to provide feedback on the sponsor. This would provide insight into what type of members leave the VISTA program early while addressing conflicts between the sponsor organization and the VISTA member.
- Enhance the existing interviews of exiting members by adding questions to determine the root causes of attrition. Interviews can also be conducted with peers and sponsors, as needed, to validate and gather more information.
- Develop and maintain more detailed and specific information regarding the reasons for attrition.
- Use the resulting information to improve member recruiting, selection, and support.

## Recommendation 4.3

***Establish member enrollment and retention goals for each fiscal year. Specifically,***

- Track enrollment and retention data to ensure that goals are met and/or to identify causes for failure to meet goals and implement corrective actions. Identify systemic member retention issues and/or patterns.
- Identify those sponsoring organizations with consistently high and low attrition. Discontinue projects with high attrition rates and reassign VISTA members to other projects, as appropriate.
- Share effective strategies among sponsors.

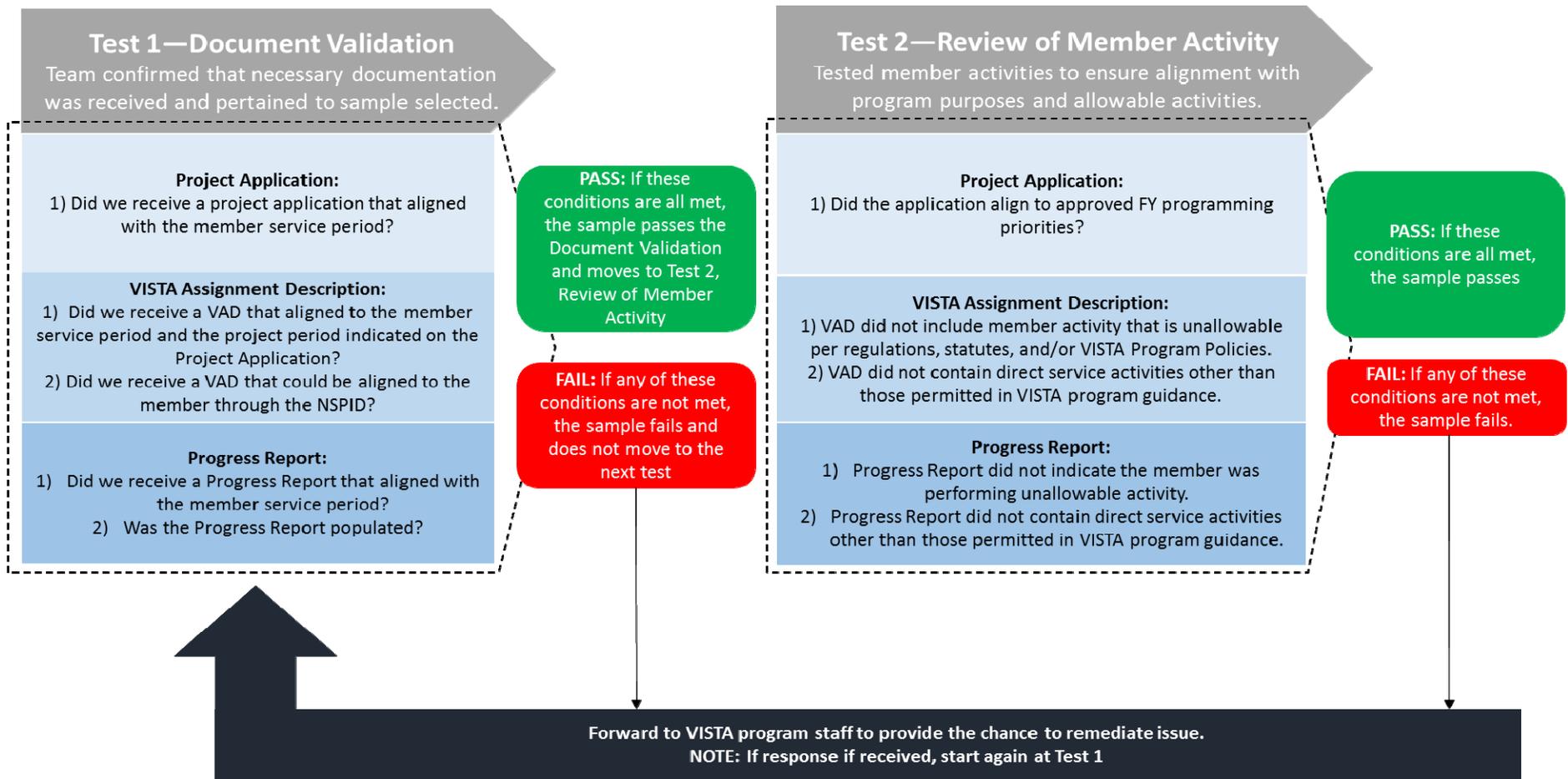
## Recommendation #5

***CNCS VISTA should build performance measures into all policy/procedure changes as a means to evaluate overall effectiveness of the change and allow for continuous process improvement. Specifically, to measure effectiveness of the policy allowing VISTA members to take classes while serving in the VISTA program, CNCS VISTA should:***

- Create a standardized area on the PPR to indicate any VISTA Members and Leaders who chose to participate in classes while serving, the type of coursework, number of hours, and duration of classes.
- Analyze data around members participating against attrition rates to measure effectiveness of the policy change.
- Perform an analysis to determine whether participation in classes is affecting project-sponsored work.
- Require explicit and documented approval from CNCS and/or the sponsor organization before members take classes.

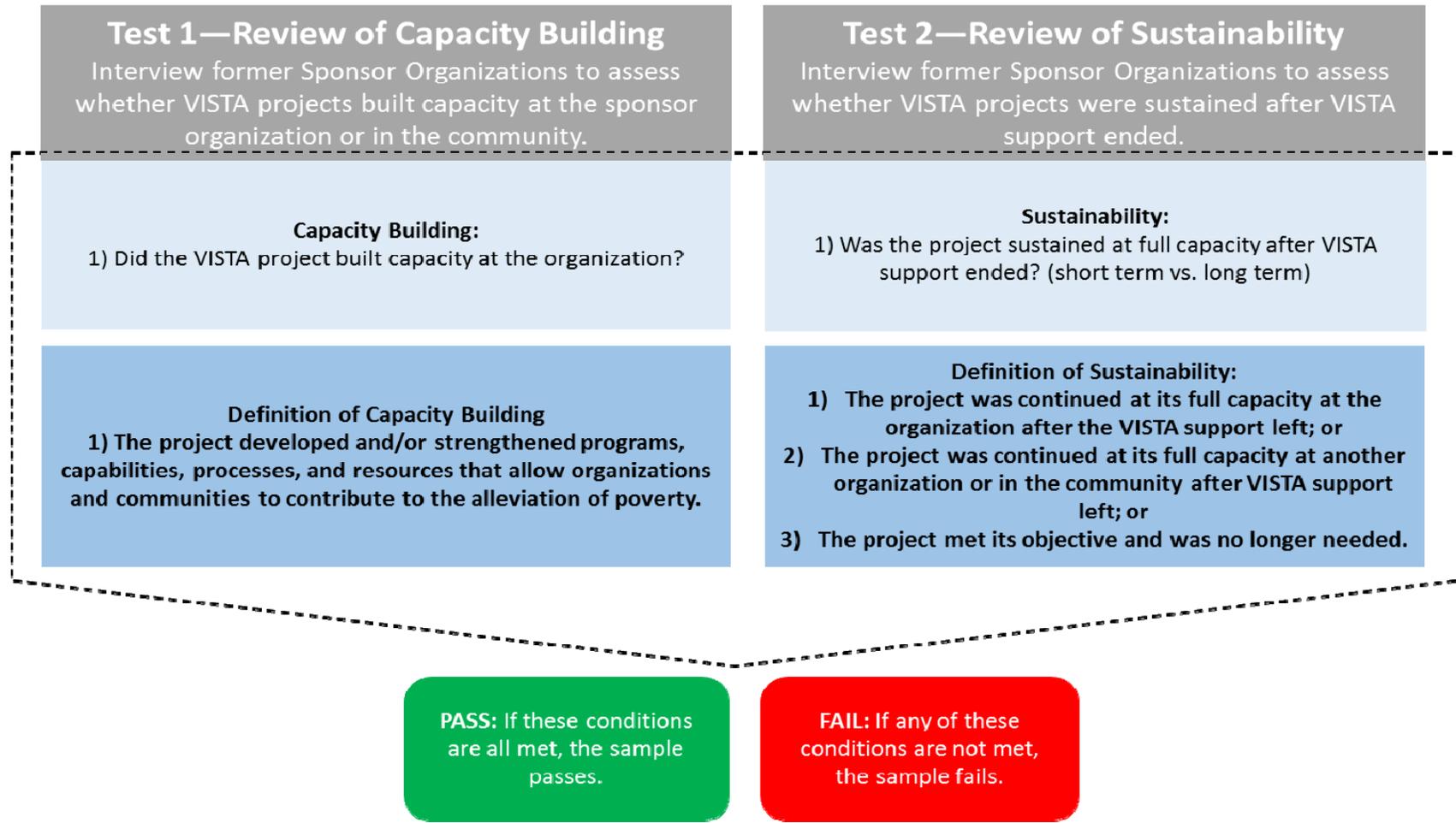
# Appendix A – Evaluation Approach

## Objective 1 - Approach



# Appendix A – Evaluation Approach

## Objective 2 - Approach



# Appendix A – Evaluation Approach

## Objective 3 - Approach

We obtained data from CNCS to determine the reasons for VISTA members' early termination from the program for FY14 and FY15 in conjunction with any prior attrition/turnover analysis that the VISTA program had completed. We used the analysis as the basis to validate the root causes of VISTA member attrition through interviews with VISTA staff, members, and project staff.

- We found several data discrepancies (differences in names and number of early terminations) in the VISTA member early termination data provided by CNCS. As a result, we performed interviews with sponsor organizations and former members to identify root causes of attrition.

In order to get a representative sample of VISTA projects with different attrition rates, twenty sponsors with high attrition (8 large sized projects and 12 medium sized projects), five sponsors with low attrition, and five former VISTA members who terminated service early were interviewed to identify and validate root causes of attrition and identify potential best practices for member retention.

# Appendix A – Evaluation Approach

## Objective 4 – Approach

Based on discussion with CNCS VISTA program management early in the evaluation, we noted that CNCS VISTA does not track quantitative data or performance measures related to the extent of members taking classes, nature of classes taken, or number of hours and duration spent on classes.

- Project sponsors are not required to provide written approval of a VISTA member's request to participate in classes while serving their VISTA terms.

Since the objective was unable to be evaluated as originally planned, qualitative data was collected through meetings with CNCS VISTA management and staff.

- We interviewed Area Managers and CSO Directors for feedback related to VISTA member educational policy.

# Corporation for National and Community Service

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To: Carol Bates, Acting Assistant Inspector General for Audit

Appendix B

From: Eileen Conoboy, Acting Director of AmeriCorps VISTA

Date: July 16, 2018

Subject: Office of Inspector General (OIG) Draft Presentation/Report of the AmeriCorps VISTA Program

This memorandum responds to the Office of Inspector General's (OIG) May 31, 2018 Draft Presentation/Report of the AmeriCorps VISTA Program Evaluation. This memorandum first reviews the program highlights noted in the report before addressing some of the weaknesses and limitations of the overall evaluation. This memorandum also reviews the program recommendations and describes existing and planned activities addressing those recommendations. We appreciate all feedback that helps enhance the AmeriCorps VISTA program (VISTA). VISTA is uniquely positioned to work with organizations and communities to improve economic wellbeing, and we are dedicated to continually strengthening the VISTA program.

## Program Highlights

The Corporation for National and Community Service (CNCS) appreciates the OIG's acknowledgment of VISTA program accomplishments included in this report. Specifically, this report identified several best practices of AmeriCorps VISTA. VISTA is working on additional methods to identify and disseminate best practices among our projects.

Furthermore, the report highlighted the impact that VISTA members have on the communities in which they are placed. For example, the OIG's report included the expansion of college access programs and the funds leveraged by VISTA members. This is the kind of impact VISTA hears about every day. In Fiscal Year 2017 alone, VISTA members mobilized more than 800,000 volunteers and leveraged \$206 million dollars in cash and in-kind resources. That's more than double every federal dollar invested in the program. CNCS appreciates the OIG including the very real impact VISTA members make.

## Presentation Limitations

In this presentation, the OIG references four objectives. As explained below, CNCS found flaws with the methodology used, samples selected, and conclusions drawn. The OIG also offers multiple recommendations to enhance the effectiveness of the VISTA program. CNCS is pleased to report that much of what is being recommended has already been implemented or is underway. Other recommendations are being explored, however some may not be viable options due to programmatic constraints.

*Objective 1: Member Activities Consistent with Program Purpose*

The OIG reviewed member activities to determine consistency with the program purpose. Significant emphasis was placed on the extent to which observed members were engaged in capacity-building activities as distinct from direct service. However, it is not clear how the OIG defined capacity building. As a result, activities that CNCS considers capacity building were characterized as direct service.

For example, documents provided to CNCS incorrectly characterize the drafting of a handbook as direct service. CNCS views this as capacity building as it will help the organization more effectively and efficiently manage their program. Additionally, a deliverable such as a handbook will be available long after the member leaves service, leading to increased consistency and sustainability.

It is also important to note that direct service is not a prohibited VISTA activity. Limited direct service is often necessary to successfully carry out a project. In the examples provided by the OIG, it does not appear that the context of the reported direct service was considered.

For example, it was noted that one member engaged in direct service at a preparation party the day before a large organized event. While it is difficult to ascertain without the benefit of the OIG's working papers, it is likely that this engagement before a community event was an incidental and appropriate VISTA activity.

Absent the OIG's operative definitions for capacity building and direct service, it is difficult to fully assess the recommendations related to measuring whether member activities were consistent with the program purpose.

*Objective 2: Enhanced Organizational Capacity and Sustained Activities*

The sample of project sponsors examined for Objective 2 appears to be a very small sample and not representative of VISTA projects or of VISTA members serving at those projects. The OIG's recommendations are based on 27 organizations sampled out of approximately 850 sponsoring organizations.<sup>1</sup> As a result, CNCS believes the percentages reported are misleading.

Further, CNCS disagrees with the OIG's definition of sustainability and notes that it is inconsistent with VISTA's use of that term. For this study, the OIG only considered a project sustainable if it "continued at full capacity once VISTA support ended." This is an unreasonable standard.

For example, using the OIG's definition of sustainability, a project with 20 members reporting that the activities of 19 members were sustained over the course of a year would be considered unsustainable despite the fact that the overwhelming majority of activities were sustained. OIG findings noted that many project activities were in fact sustained; however, definitional and sample issues resulted in inaccurate findings and percentages in the report.

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<sup>1</sup> This sample includes two projects that CNCS closed before the organizations received any resources from VISTA. Including these closed projects when assessing sustainability presupposes that VISTA resources had been provided to begin with – a faulty premise. Including projects that never received VISTA members in the sustainability figures skews the results and compromises the sample.

Resource-strapped organizations often choose to sustain the most critical work that starts and develops in a VISTA project to best address community needs. Community needs may shift over time, reducing the need for some activities. Requiring 100% “sustainability” leads to an inaccurate and misleading calculation of VISTA’s actual sustainability.

#### *Objective 3: Member Attrition*

The early termination figures the OIG used for Objective 3 were derived from a one-year population analysis, and the causes for terminations were identified through the OIG’s interviews with project sponsors and former members. It does not appear that the projects and members interviewed were discussing early terminations that occurred during the timeframe analyzed.

#### *Objective 4: Educational Classes during Service*

CNCS expressed concern about this objective during the entrance conference. VISTA encourages the professional and academic development of VISTA members. VISTA does not deem it a prudent use of resources to track the classes they take in their off hours.

### **CNCS Response to Recommendations**

It is not clear whether the OIG is aware of existing CNCS resources that address many of these proposed recommendations and if the OIG is aware of the steps and resources that CNCS has taken to strengthen the VISTA program in the years since this evaluation was initiated. As a result, this response includes actions CNCS has already taken as well as those that are under consideration. CNCS will review the recommendations anew after receiving the OIG’s working papers.

It should also be noted that the VISTA program has been the focus of several studies conducted by third party, scientific research firms. These studies looked at similar components of the VISTA program as those included in the OIG evaluation, including member activity alignment and project sustainability. As such, it is essential and prudent that we review all available evidence before implementing resource-intensive recommendations. The proposed recommendations are outlined below and addressed in bullet format to correspond with formatting of the draft report presentation.

*Recommendation 1.1: Make enhancements and improvements to the data, information, and documents used to monitor VISTA projects and member activities to enable timely and effective oversight and monitoring.*

CNCS is always looking for ways to enhance and improve all aspects of the VISTA program including the data, information, and documents related to oversight and monitoring.

- A third-party research firm recently examined the concurrence between planned and accomplished VISTA activities. It was determined that the “majority of activities reported in concept papers, applications, and VISTA Assignment Descriptions (VADs) tend to also be present in the Project Progress Report (PPR), suggesting that sponsors are accomplishing most of the service activities they mentioned in their initial documents.” This study reviewed a much larger sample of projects than the current evaluation and used scientific methods to ensure certain sponsors were not overrepresented in the sample.

- Because sponsors are currently reporting on member activities in a way that shows member activities are aligned with initial project applications, VISTA disagrees with the OIG's specific recommendation to require sponsors to provide a detailed progress description for each member. This would be overly burdensome for project staff and Program Officers. However, VISTA will consider revising the PPR narrative fields and/or guidance to more explicitly request information on service activities.
- In 2018, as part of VISTA's enhanced internal control system, the team designed and launched a report to identify all active members not assigned a current VAD. This report is automatically generated every two weeks and distributed to members of the VISTA and Office of Field Liaison (OFL) teams to ensure that a VAD is assigned to all active members. Additionally, VISTA and OFL collaborated to design and present a required VAD training for OFL staff. This training emphasized how to work with projects to ensure quality VADs and discussed when VAD revisions are needed. This training was recorded and is available for staff to review.
- The PPR system that was implemented with the adoption of Agency-wide Performance Measures requires that all PPRs and staff feedback be completed in eGrants, the current system of record. This information is stored electronically and can be easily accessed by project staff, Program Officers, and the VISTA program office. The VISTA Desk Reference (VDR), which serves as the operating manual for OFL staff, clearly defines the processes and procedures for scheduling, reviewing, and documenting the review of PPRs, VADs, and project applications.
- At a minimum, the VISTA team will ensure the VDR instructs Program Officers to clearly communicate Progress Report deadlines to project sponsors. The team will further explore the option of adopting consistent reporting deadlines that could be included in general project sponsor materials.
- The VDR instructs Program Officers to review PPRs to ensure that reported activities align with the VAD and project application. VISTA will work with OFL to determine if additional OFL staff training or guidance is needed regarding the review of PPRs.
- Current PPR instructions require projects to describe specific strategies that are in place to sustain the project.

*Recommendation 1.2: Enhance VISTA's existing monitoring program to improve the effectiveness of monitoring activities.*

- VISTA is currently working with OFL and the Office of the Chief Risk Officer (OCRO) to modify the existing risk assessment process. CNCS currently requires that all active projects be evaluated as part of our existing risk assessment process. Those projects determined to pose the most risk receive compliance monitoring visits.

- OFL staff are instructed to document various components of a monitoring visit, including who the team met with, what was reviewed, issues identified, and a list of necessary corrective actions. The VISTA team will consider adding this list to the monitoring document and/or feedback template letter to ensure greater consistency in capturing this information.
- Prior to a compliance monitoring visit, OFL staff are required to review completed PPRs to note any issues that warrant on-site follow up. Additionally, many of the questions from the existing monitoring tool are similar to questions addressed by sponsors when completing the PPR. OFL staff are expected to follow up on discrepancies uncovered during the monitoring visit. The VISTA team will revise the monitoring tool to require more consistent review and validation of information reported in the PPR.
- CNCS expects Program Officers to monitor corrective actions identified for remediation during a compliance visit on a regular basis. The VISTA team will ensure the monitoring tool clearly states that corrective actions must be assessed no less than quarterly. VISTA will work with OFL and other departments to ensure consistent messaging.
- The VISTA program will take recommendations regarding enhancements to the intermediary host site monitoring process under consideration as we continue to develop and refine our intermediary program guidance.

*Recommendation 2: CNCS VISTA should develop a standard for capturing capacity building and measuring sustainability during and after the VISTA project is completed.*

- VISTA will consult with the CNCS Office of Research and Evaluation and other experts to consider developing a definition and standard for sustainability.
- VISTA applicants are required to provide a description of how the project will build long-term sustainability in the organization or program to ensure it continues after the VISTA resources end. Sponsors are required to report on this in each PPR and to note any changes to the plan in continuation applications. Additional efforts towards sustainability will be reviewed as part of the compliance monitoring process and through the review of the OIG's recommendations, keeping in mind, however, that multiple third party, scientific studies have been completed assessing the sustainability of VISTA projects. These studies used rigorous scientific methods to determine appropriate and representative sample sizes. According to the most recent study conducted by Westat, the VISTA program was extremely successful and the overwhelming majority of respondents reported that VISTA project activities had been sustained.
- VISTA has numerous tools and resources regarding sustainability and capacity building available to project sponsors on the [VISTA Campus](#) (e.g., Beyond VISTA: Project Sustainability Approaches and Strategies; Program Sustainability Assessment Tool; Building Sustainability for Nonprofit Organizations).

- The VISTA team continues to analyze data collected through performance measures and is working with other CNCS departments to review performance measures across all programs.

*Recommendation 3.1: Improve the quality, thoroughness, and availability of information available to VISTA recruits in order to provide sufficient understanding of the VISTA program and member expectations/responsibilities prior to the interview process.*

- Every VISTA supervisor and VISTA member is required to complete an online tutorial on the VISTA Terms and Conditions. The tutorial covers the mission and focus of the VISTA Program, permitted and prohibited activities, and policies relating to religious and political activities, education and employment, and social media activities. The tutorial includes a learning check to ensure learning attainment.
- Additionally, VISTA has resources available on the [VISTA Campus](#) to help sponsors better explain the difference between capacity building and direct service so that applicants can determine if capacity building is for them.
- The current online recruitment system serves as a clearinghouse for all available VISTA positions. Through this website, potential applicants can search for opportunities and learn more about specific projects, organizations, and positions.
- VISTA sponsors are encouraged to use the VISTA Assignment Description (VAD) as part of the recruitment process. This includes providing a copy of the VAD prior to or as part of the interview process. Additionally, the VAD informs the opportunity listing that is posted on the recruitment site. The AmeriCorps VISTA Sponsor Guide to Recruitment stresses the importance of the opportunity listing accurately reflecting the VAD. The Guide, in addition to numerous other materials, is available on VISTA's [Outreach and Recruitment Resources](#) website.
- The [VISTA Campus](#) provides numerous resources on all member benefits, including the VISTA living allowance. These resources are available to applicants, members, sponsors, and the general public (e.g., Tips for Sticking to Your Budget; Budget Planning Strategies; Resources on Financial Literacy and Everyday Savings).
- VISTA has also begun hosting widely attended informational webinars for potential applicants. This provides an opportunity for potential applicants to learn more about the VISTA program before deciding whether or not to apply.

*Recommendation 3.2: The Corporation should provide guidance and resources to the sponsors to improve the consistency of the member recruiting and interview process so that recruits are adequately informed of program goals and expectations.*

- VISTA provides numerous resources to project sponsors to assist with member recruitment. These materials are currently available on the [VISTA Campus](#) and on the [Outreach and](#)

Recruitment Resources section of our website. Materials provide sponsors with suggested community organizations and activities to aid with recruitment.

- The materials available on the sites referenced above highlight the need to discuss the amount of the living allowance as well as the cost of living in the area. While the VISTA program is open to having members and leaders participate in the interview process, we would not want them to lead the interview process or to make final determinations regarding someone's suitability for the program. It is the responsibility of the sponsoring organization and ultimately CNCS to make this determination.
- As mentioned above, VISTA has made numerous financial literacy tools and resources available to projects, members, and applicants. VISTA will encourage sponsors to use and recommend these materials during the recruitment process so that potential members can make more informed financial decisions.
- VISTA has developed numerous resources for sponsors to assist with recruiting and interviewing. Materials are presented in written format on our website and on the VISTA Campus. Additionally, the VISTA team hosts live recruitment webinars which are recorded and available for streaming. Some of the topics addressed in recent trainings include: recruitment timelines; behavioral traits leading to successful members; interview templates; recruitment tips; and writing effective position descriptions. In addition to the many webinars and training materials available, the team hosts Recruitment Office Hours to address specific issues and challenges raised by VISTA project sponsors.
- VISTA is creating an easily accessible resource for VISTA projects that will include all information relevant to the VISTA program. This online resource will include everything a project needs to know, from recruitment to PPR completion. This will assist projects in knowing where to go to find the many available resources.

*Recommendation 3.3: VISTA must address squarely the fact that financial considerations cause 13.44 percent of VISTA members to fail to complete their service terms.*

- The VISTA statute, the Domestic Volunteer Service Act of 1973, mandates that members "live among and at the economic level of the people served." VISTA understands this may be challenging for members and has taken other steps to enhance the benefits offered to members for their service. For example, in 2017, VISTA removed the benefit cap for childcare reimbursement and now relies on guidelines set by each state. Also in 2017, VISTA began offering all members telehealth services at no cost. VISTA has also issued guidance to project sponsors regarding approved financial and in-kind support that sponsors may provide to members.
- To ensure VISTA members receive an equitable living allowance across the nation while taking the cost of living expenses into consideration, VISTA has developed and implemented a clear

process which calibrates living allowances by county. As part of this process, VISTA performs annual reviews of current living allowance rates, the cost of housing, and the poverty level to determine any cost of living adjustments that need to be made. As a result of adopting this process, most VISTA members saw a significant increase (8% average) to their annual living allowance amount in 2017.

- VISTA has included sponsors and members in the development of tips and strategies to assist new members. Specific materials available to assist members are listed above. As previously mentioned, VISTA will work to ensure that potential members are made aware of financial considerations during the recruitment and interview process.

*Recommendation 3.4: Create and foster an enhanced sense of community and internal support among VISTA members.*

- The VISTA program keeps current members engaged through the thoughtful and strategic use of ongoing webinars. VISTA currently hosts two webinars per month for VISTA members. One webinar tends to focus on skill building, while the other typically focuses on life as a VISTA member. Additionally, the VISTA program is developing a calendar of In-Service Training opportunities to bring members together during their service year for professional development and networking.
- VISTA is examining the current intermediary model, including existing best practices. Many intermediary projects are experts in fostering a sense of community among members and providing additional support. We plan to continue strengthening this model by issuing guidance and sharing best practices.

*Recommendation 4.1: CNCS VISTA should develop and implement a strategy for improving member retention. Develop a comprehensive, risk-based member enrollment and retention strategy. This includes, but is not limited to, identifying the characteristics of individuals who are most likely to succeed in the VISTA program and developing interview techniques and applicant questions to identify applicants to complete their service terms successfully.*

- VISTA analyzes attrition and retention data on an annual basis. While we are supportive of using this information to strengthen the program, we are cautious in adopting any strategies that could be unintentionally discriminatory. Instead, the VISTA program would rather address what may be potential barriers to service. For example, we are aware that females are more likely to complete their service terms. However, this does not mean that we do not want more men to serve in the program. We would rather perform additional analysis to determine why this difference exists and how we may be able to better support male members to complete their service terms.
- VISTA has developed additional candidate screening guidance and provided training to support CNCS Program Officers in determining whether to approve or reject candidates. We

believe that this additional guidance and training will help us better ensure that we are selecting the most qualified applicants without being discriminatory.

*Recommendation 4.2: Improve member attrition and retention data collection/quality and implement consistently across all sponsor organizations.*

- VISTA has a standard process for collecting attrition and retention data. A Future Plans Form is completed by or for each member exiting service, regardless of the timing of or reason for the exit. This form provides the opportunity for both the member and the sponsor to comment on the overall experience. CNCS Program Officers follow up as appropriate.
- VISTA is currently reviewing the available reasons on the Future Plans Form to categorize each termination, and data improvements are underway to provide VISTA with more representative and useful data. VISTA will continue to use this data (and consider whether additional data is needed) to inform recruitment, selection, and member/project support.

*Recommendation 4.3: Establish member enrollment and retention goals for each fiscal year.*

- In addition to the strategies referenced below, VISTA will explore implementing retention rate targets in future years as part of our ongoing improvement efforts. VISTA will continue to track and monitor the quantitative and qualitative data we have to identify trends and address any major shifts.
- VISTA is interested in increasing member satisfaction and commitment to the program, which may subsequently improve retention. VISTA's retention rate is on par with other AmeriCorps programs.
- VISTA CNCS Program Officers are instructed to consider a project's retention rates when determining whether to continue a VISTA project. VISTA has made this information readily available to Program Officers through the use of the VISTA Mega Chart. Additionally, Program Officers review retention as part of the current Risk Assessment process which informs compliance monitoring schedules.
- VISTA hosts monthly webinars for project sponsors, many of which are focused on member retention. Recordings are placed on the [VISTA Campus](#) and are available for projects to view on demand.

*Recommendation 5: CNCS VISTA should build performance measures into all policy/procedure changes as a means to evaluate overall effectiveness of the change and allow for continuous process improvement. VISTA should specifically measure the effectiveness of the policy allowing VISTA members to take classes while serving in the VISTA program.*

- VISTA has procedures in place to track policy changes for which there is programmatic benefit. VISTA chose not to invest in the tracking and analysis of VISTA members taking classes outside

of their VISTA service time, and similarly does not track their hobbies/other activities. In contrast, VISTA made a policy change in 2015 that lifted the prohibition on outside employment for VISTA members, and VISTA determined this policy shift was worth the investment of time and resources to track and analyze. Members were citing financial problems and outside employment offers as reasons for their early exit from the program, and the implications of this policy change needed to be monitored closely.

- Project sponsors are required to approve any request by a member to engage in outside employment. Additionally, the Program Officer is required to review all requests to ensure full compliance with the policy.
- VISTA annually reviews the number of members accepting outside employment and estimates the number of hours each member will be employed. This information is analyzed in conjunction with attrition rates, causes for attrition, and other data to help VISTA better understand the impact of the policy change. Additional tracking in the PPR is not necessary.

### **Conclusion**

VISTA appreciates and shares the OIG's interest in finding ways to further improve the effectiveness of the VISTA program. From transforming our training programs, to creating a new data analyst position, to increasing supports for VISTA members and supervisors, we have made many programmatic advances since the OIG initiated their work on this program evaluation in 2015. We are eager to continue moving this antipoverty program forward and continue to find ways to work better and smarter. While the OIG's presentation fell short of our expectations in terms of sampling, program knowledge, and actionable recommendations, we welcome and appreciate different lenses applied to the VISTA program and are confident that all feedback helps us review, reflect, and do our work better.

cc: Thomas Chin, Office of Inspector General, CNCS  
Kim Mansaray, Chief of Program Operations, CNCS  
Lori Giblin, Chief Risk Officer, CNCS



## **Appendix C: Corporation for National and Community Service (CNCS) Response and Office of Inspector General (OIG) Comments**

### **Findings**

#### **Objective 1: *Member Activities Consistent with Program Purpose***

**CNCS Response:** CNCS stated that OIG placed significant emphasis on the extent to which observed VISTA members engaged in capacity-building activities as distinct from direct service, and therefore, activities that CNCS considers as capacity building were characterized as direct service. CNCS stated that direct service is not a prohibited VISTA activity, and in some cases, limited direct service is needed to successfully complete a project. In the examples the OIG provided, it does not appear that the context of the reported direct service was considered. CNCS also stated that without OIG's working papers and operative definitions for capacity building and direct service, it is difficult for CNCS to fully assess the recommendations related to measuring whether member activities were consistent with the program purpose.

**OIG Comment:** Before the February 12, 2018, exit conference, we provided CNCS detailed written descriptions of instances (including VISTA project name, date, and member ID number) in which VISTA members performed direct service. Our conclusions were based on discussions with VISTA members and/or progress reports submitted directly by project staff. We also used the VISTA Member Handbook (Handbook) as criteria on the three limited circumstances where direct service is appropriate.<sup>1</sup> Further, direct service activities we reported were not consistent with program purposes, replaced full-time staff, or were performed late in the members' terms when such activities served no purpose for the member to understand core functions of the sponsor organization.

#### **Objective 2: *Enhanced Organizational Capacity and Sustained Activities***

**CNCS Response:** CNCS stated that the sample of project sponsors examined for Objective 2 appears to be a very small sample and not representative of VISTA projects or of VISTA members serving at those projects. Since OIG's recommendations are based on 27 organizations sampled

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<sup>1</sup> The three limited circumstances that allow VISTA members to perform direct services include: (1) a brief period of direct service is necessary to understand the service elements of the sponsoring organization, (2) direct service is incidental to the time and effort in carrying out the primary responsibilities of the member assignment, or (3) direct service is necessary for training purposes. Handbook at Chp. 1.: Background & Purpose.

out of approximately 850 sponsoring organizations, CNCS believes the reported percentages are misleading. Also, CNCS disagrees with the OIG's definition of sustainability as OIG only considered a project sustainable if it "continued at full capacity once VISTA support ended," which CNCS believes is an unreasonable standard. Because community needs may change over time, this reduces the need for some activities, and requiring complete sustainability leads to an inaccurate and misleading calculation of VISTA's actual sustainability.

**OIG Comment:** Our original evaluation objective was to use statistical sampling and project the rate of projects that maintained sustainability on a program-wide scale. Significant flaws in VISTA data quality and lack of historical performance measurement data prevented us from drawing a statistical conclusion. However, we selected all samples on a random basis and followed the standard sampling techniques as typically applied in audits/evaluations. We do not believe our samples reviewed under this objective contain sampling bias as each project had an equal chance of being selected, regardless of size or geographic location. A random sample does not necessarily need a large sample size to draw meaningful conclusions. For example, as part of the financial statement internal control testing, a typical sample size of 45 transactions applies for each significant financial statement line item. The total number of transactions in many accounts far exceeds the approximate 850 VISTA sponsor population.

Before the exit conference we provided CNCS detailed written descriptions of instances (including VISTA project name and date) in which we identified projects that were not sustained. As discussed in the report and the separate detailed descriptions of instances, we noted four projects were not sustained (and ultimately closed). For these four projects we found that members performed largely direct service activities or there was an inability to recruit VISTA members. For the rest of the eight instances where we concluded the projects were not sustained, the projects either ended or significantly scaled back shortly after VISTA members completed their terms. CNCS does not have a definition of sustainability for the VISTA program. Therefore, we exercised some judgment to determine the extent of project sustainability. We defined project sustainability as continuation at full capacity once VISTA member support ended. We found that all of the 12 VISTA projects were discontinued.

### **Objective 3: *Member Attrition***

**CNCS Response:** CNCS stated that the early termination figures the OIG used for Objective 3 were derived from a one-year population analysis, and the causes for terminations were identified through OIG's interviews with project sponsors and former members. CNCS also stated that it did not appear that the projects and members interviewed discussed early terminations that occurred during the timeframe analyzed.

**OIG Comment:** VISTA program staff provided the one-year early termination analysis. We used the analysis as the basis to validate the root causes of VISTA member attrition through interviews with VISTA staff, members, and project staff. The evaluation approach and methodology is included in Appendix A of the report.

#### **Objective 4: Educational Classes during Service**

**CNCS Response:** CNCS stated that it encouraged professional and academic development of VISTA members and believed that it is a prudent use of resources to track the classes VISTA members take in their off hours.

**OIG Comment:** We maintain our position that CNCS should build performance measures into all policy/procedure changes as a means to evaluate overall effectiveness of the change and allow for continuous process improvement. This includes measuring effectiveness of the policy allowing VISTA members to take classes while serving in the VISTA program.

#### **Recommendations**

**Recommendation 1.1:** *Make enhancements and improvements to the data, information, and documents used to monitor VISTA projects and member activities to enable timely and effective oversight and monitoring.*

**CNCS Response:** CNCS disagrees with OIG's recommendation to require sponsors to provide a detailed progress description for each member because sponsors are currently reporting on member activities in a way that shows member activities are aligned with initial project applications. These would be overly burdensome for project staff and Program Officer. However, VISTA will consider revising Project Progress Report (PPR) narrative fields and/or guidance to more explicitly request information on service activities.

CNCS cited that the VISTA Desk Reference (VDR) defines the processes and procedures for scheduling, reviewing, and documenting the review of PPRs, VADs, and project applications. CNCS will ensure the VDR instructs Program Officers clearly communicate PPR deadlines to project sponsors, and will explore the option of adopting consistent reporting deadlines that could be included in general sponsor materials. VISTA staff plan to work with Office of Field Liaison (OFL) to determine if additional OFL staff training or guidance is needed regarding the review of PPRs.

**OIG Comment:** We concur with CNCS's corrective actions to strengthen controls to communicate PPR deadlines and review of PPRs by Program Officers. We do not agree that it is overly burdensome to require sponsors to provide a detailed progress description for each VISTA member.

Currently, sponsoring organizations submit their PPRs to VISTA Program Officers via eGrants. PPRs contain mostly self-reported data by sponsoring organizations. By nature sponsors do not tend to report "unfavorable" progress or incidents that are not aligned with program guidance (for example, when VISTA members perform unallowable services outside the grant terms and conditions). Also, there are no functions in eGrants which allow Program Officers to document their assessments or verifications of sponsor organizations' reported program progress. Most sponsor organizations typically have a handful of VISTA members. Strengthening the PPR reporting requirements on member activities provides additional controls to program operations

and transparency to Program Officers for early detection of any potential misuse of member services.

**Recommendation 1.2:** *Enhance VISTA's existing monitoring program to improve the effectiveness of monitoring activities.*

**CNCS Response:** CNCS stated that VISTA is currently working with OFL and the Office of the Chief Risk Officer to modify the existing risk assessment process. OFL staff are instructed to document various components of a monitoring visit, including who the team met with, what was reviewed, issues identified, and a list of necessary corrective actions. The VISTA team will consider adding this list to the monitoring document and/or feedback template letter to ensure greater consistency in capturing this information.

Prior to a compliance monitoring visit, OFL staff review completed PPRs to note any issues that warrant on-site follow up and follow up on discrepancies uncovered during the monitoring visit. The VISTA team will revise the monitoring tool to require more consistent review and validation of information reported in the PPR. CNCS expects Program Officers to monitor corrective actions identified for remediation during a compliance visit on a regular basis. The VISTA team will ensure the monitoring tool clearly states that corrective actions must be assessed no less than quarterly. VISTA will also work with OFL and other departments to ensure consistent messaging. Finally, the VISTA program will take recommendations regarding enhancements to the intermediary host site monitoring process.

**OIG Comment:** The CNCS corrective action plan meets the intent of our recommendation. CNCS management should ensure that the corrective actions are taken in a timely manner. We will confirm the implementation of CNCS's corrective actions during the audit resolution process.

**Recommendation 2:** *CNCS VISTA should develop a standard for capturing capacity building and measuring sustainability during and after the VISTA project is completed.*

**CNCS Response:** VISTA will consult with CNCS's Office of Research and Evaluation and other experts to consider developing a definition and standard for sustainability. Also, CNCS now requires VISTA applicants to provide a description of how the project will build long-term sustainability in the organization or program to ensure it continues after the VISTA resources end; and requires sponsors to report on project sustainability in each PPR and to note any changes to the plan in continuation applications.

CNCS will make additional efforts towards sustainability as part of the compliance monitoring process and through the review of OIG's recommendations. CNCS also stated that it has numerous tools and resources regarding sustainability and capacity building available to project sponsors on the VISTA Campus website. CNCS continues to analyze data collected through performance measures and is working with other CNCS departments to review performance measures across all programs.

**OIG Comment:** The CNCS corrective action plan meets the intent of our recommendation. CNCS management should ensure that the corrective actions are taken in a timely manner. We will

confirm the implementation of CNCS's corrective actions during the audit resolution process. OIG also suggests that CNCS performs a program-wide study and factors in the size and activities of sponsoring organizations, as part of its effort to develop a definition and standard for sustainability.

**Recommendation 3.1:** *Improve the quality, thoroughness, and availability of information available to VISTA recruits in order to provide sufficient understanding of the VISTA program and member expectations/responsibilities prior to the interview process.*

**CNCS Response:** CNCS's response included the following corrective actions that have been implemented:

- Every VISTA supervisor and VISTA member is required to complete an online tutorial on the VISTA Terms and Conditions. The tutorial covers the mission and focus of the program, permitted and prohibited activities, and policies relating to religious and political activities, education and employment, and social media activities;
- VISTA provides resources on the VISTA Campus website to help sponsors better explain the difference between capacity building and direct service, so that applicants can determine if capacity building suits them;
- The VISTA Campus website also provides resources pertaining to member benefits, including the VISTA living allowance;
- The current online recruitment system serves as a clearinghouse for all available VISTA positions, which potential applicants can use to search for opportunities and learn more about certain projects, organizations, and positions;
- VISTA sponsors are encouraged to use the VAD as part of the recruitment process, and a copy of the VAD is provided prior to or as part of the interview process; and
- VISTA has begun hosting informational webinars for potential applicants to learn more about the VISTA program before deciding whether or not to apply.

**OIG Comment:** We appreciate that corrective actions have taken place. The above resources will provide additional information to prospective VISTA members, meeting the intent of our recommendations. In addition to providing these enhanced resources and information, and recognizing the importance of evaluating the overall effectiveness of such training and outreach initiatives in meeting its important goals of member education and retention, we suggest that CNCS measure the impact these resources and tools have on member retention. Once implemented, CNCS should determine the usefulness of these resources to potential recruits and sponsoring organizations and refine contents of these resources as necessary.

We also recommend that sponsoring organizations be required rather than "encouraged," to provide VADs to potential members during the recruitment process. VADs should already be developed and approved by CNCS Program Officers before the recruitment process begins. Therefore, sponsoring organizations should be able to share the VADs with recruits to allow them to make informed decisions regarding whether to participate in the VISTA program.

**Recommendation 3.2:** *The CNCS should provide guidance and resources to the sponsors to improve consistency of the member recruiting and interview process so that recruits are*

*adequately informed of program goals and expectations.*

**CNCS Response:** The CNCS response included the following corrective actions that had been or will be implemented:

- VISTA provides resources, which are available on the VISTA Campus and Outreach and Recruitment Resources of the CNCS website, to project sponsors to assist with member recruitment. Materials provide sponsors with suggested community organizations and activities to aid with recruitment;
- VISTA created financial literacy tools and resources available to projects, members, and applicants;
- VISTA developed resources for sponsors to assist with recruiting and interviewing. The VISTA team hosts live recruitment webinars which are recorded and available for streaming. Some of the topics addressed in recent trainings include: recruitment timelines; behavioral traits leading to successful members; interview templates; recruitment tips; and writing effective position descriptions;
- VISTA hosts Recruitment Office Hours to address certain issues raised by VISTA project sponsors; and
- VISTA is creating an accessible resource for VISTA projects that will include all information relevant to the VISTA program, from recruitment to PPR completion.

**OIG Comment:** CNCS's corrective actions meet the intent of our recommendations. As discussed above, to ensure that these corrective actions are effective in the long term, we suggest that CNCS measures the impact these resources and tools have on member retention. Once implemented, CNCS should determine the usefulness of these resources to potential recruits and sponsoring organizations and refine contents of these resources as necessary.

**Recommendation 3.3:** *VISTA must address the fact that financial considerations cause 13.44 percent of VISTA members to fail to complete their service terms.*

**CNCS Response:** CNCS cited the Domestic Volunteer Service Act of 1973 which mandates that members "live among and at the economic level of the people served." VISTA understands this may be challenging for members and has taken steps to enhance the benefits offered to members for their service. For example, VISTA removed the benefit cap for childcare reimbursement and began to offer all members telehealth services at no cost in 2017. VISTA also issued guidance to project sponsors regarding approved financial and in-kind support that sponsors may provide to members.

CNCS stated that it developed and implemented a process which calibrates living allowances by county to ensure members receive equitable living allowance. As part of this process, VISTA performs annual reviews of current living allowance rates, the cost of housing, and the poverty level to determine any cost of living adjustments that need to be made. After adopting this process, most VISTA members saw an increase (8 percent on average) to their annual living allowance amount in 2017. Further, VISTA included sponsors and members in the development of tips and strategies to assist new members. VISTA will also ensure that potential members are made aware of financial considerations during the recruitment and interview process.

**OIG Comment:** The CNCS corrective action plan meets the intent of our recommendation. CNCS management should ensure that the corrective actions are taken in a timely manner. We will confirm the implementation of CNCS's corrective actions during the audit resolution process.

**Recommendation 3.4:** *Create and foster an enhanced sense of community and internal support among VISTA members.*

**CNCS Response:** CNCS stated that it keeps current members engaged using ongoing webinars, which VISTA hosts twice a month for members. One webinar focuses on skill building, while the other focuses on life as a VISTA member. Also, the VISTA program is developing a calendar of In-Service Training opportunities to bring members together during their service year for professional development and networking. VISTA is also examining the current intermediary model, including existing best practices. Many intermediary projects are experts in fostering a sense of community among members and providing additional support. CNCS plans to continue strengthening this model by issuing guidance and sharing best practices.

**OIG Comment:** The CNCS corrective action plan meets the intent of our recommendation. CNCS management should ensure that the corrective actions are taken in a timely manner. We will confirm the implementation of CNCS's corrective actions during the audit resolution process.

**Recommendation 4.1:** *CNCS VISTA should develop and implement a strategy for improving member retention. Develop a comprehensive, risk-based member enrollment and retention strategy. This includes, but it is not limited to, identifying the characteristics of individuals who are most likely to succeed in the VISTA program and developing interview techniques and applicant questions to identify applicants to complete their service terms successfully.*

**CNCS Response:** CNCS stated that it analyzes attrition and retention data on an annual basis. It is cautious in adopting any strategies of using individual data, like gender, that could be unintentionally discriminatory. Instead, CNCS focuses on addressing what may be potential barriers to service. Also, CNCS developed additional candidate screening guidance and provided training to support CNCS's Program Officers in determining whether to approve or reject candidates. CNCS believes this additional guidance and training will ensure that it selects the most qualified applicants without being discriminatory.

**OIG Comment:** While OIG shared CNCS's concerns on using certain individual data, like gender, as part of the member enrollment and retention strategy, we suggest that CNCS examine other non-bias producing characteristics such as the individual's past performance factors including history of school work and prior work experience. As our recommendation refers to the development of a comprehensive, risk-based member enrollment and retention strategy, the VISTA data analytics staff could reach out to some large National Direct grantees who use data analytics as part of their member recruitment process.

We determined that the corrective actions regarding development of additional candidate screening guidance and training meet the intent of our recommendation. CNCS management

should ensure that the corrective actions are taken in a timely manner. OIG will determine the implementation of CNCS's corrective actions during the audit resolution process

**Recommendation 4.2:** *Improve member attrition and retention data collection/quality and implement consistently across all sponsor organizations.*

**CNCS Response:** CNCS stated that VISTA has a standard process for collecting attrition and retention data. A Future Plans Form is completed by or for each member exiting service, regardless of the timing of or reason for the exit. This Form provides the opportunity for both the member and the sponsor to comment on the overall VISTA experience and allows CNCS Program Officers to follow up as appropriate. CNCS is currently reviewing the available options on the Future Plans Form to categorize each termination reason, and data improvements are underway to provide VISTA with more representative and useful data. CNCS will continue to use this data to inform recruitment, selection, and member/project support.

**OIG Comment:** The CNCS corrective action plan meets the intent of our recommendation. CNCS management should ensure that the corrective actions are taken in a timely manner. We will confirm the implementation of CNCS's corrective actions during the audit resolution process.

**Recommendation 4.3:** *Establish member enrollment and retention goals for each fiscal year.*

**CNCS Response:** CNCS stated that it requires Program Officers to consider a project's retention rate when determining whether to continue a VISTA project. The VISTA program office has made this information readily available to Program Officers through the VISTA Mega Chart. Also, Program Officers review retention as part of the current risk assessment process which informs compliance monitoring schedules.

The VISTA program office now hosts (and records on-demand) monthly webinars for project sponsors, many of which focus on member retention. The VISTA program office will also explore implementing retention rate targets in future years, and tracking and monitoring the quantitative and qualitative data to identify member retention trends.

**OIG Response:** The CNCS corrective action plan meets the intent of our recommendation. CNCS management should ensure that the corrective actions are taken in a timely manner. We will confirm the implementation of CNCS's corrective actions during the audit resolution process.

**Recommendation 5:** *CNCS VISTA should build performance measures into all policy/procedure changes as a means to evaluate overall effectiveness of the change and allow for continuous process improvement. VISTA should specifically measure the effectiveness of the policy allowing VISTA members to take classes while serving in the VISTA program.*

**CNCS Response:** CNCS stated that it has procedures in place to track policy changes. However, it chooses not to invest resources in tracking and analyzing VISTA members who take classes outside of their VISTA service time. CNCS stated that it annually reviews the number of members accepting outside employment and estimates the number of hours each member will be employed. This information is analyzed in conjunction with attrition rates, causes for attrition,

and other data to help VISTA better understand the impact of the policy change. CNCS requires project sponsors to approve any request by a member to engage in outside employment. Also, Program Officers review all such requests to ensure full compliance with the policy.

**OIG Comment:** OIG maintains our position that CNCS should build performance measures into all policy/procedure changes as a means to evaluate overall effectiveness of the change and allow for continuous process improvement. This includes measuring effectiveness of allowing VISTA members to take training classes while serving in the VISTA program.

When the sponsor organizations properly collect data to identify members who take training classes, the additional data collection task should not be a significant administrative burden. The data collected, however, would provide insight to confirm whether training classes improve VISTA members work and potentially strengthens the business case for continuing this policy.

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