

Missouri Community Service Commission Policies & Procedures for Sub-Grantees

PROGRAM MANAGEMENT	2
National Service Criminal History Checks.....	2
Member Contracts.....	3
Prohibited Activities	4
Anti-Lobbying.....	5
Reporting Deadlines	6
Program Modification Request Requirements.....	7
FINANCIAL MANAGEMENT	7
Member Living Allowance.....	7
Unemployment Insurance	9
Mileage Reimbursement.....	9
Reimbursement for Meals and Lodging.....	10
Purchasing Equipment with Federal Funds	12
Budget Modification Request Requirements	12
MEMBER MANAGEMENT	13
CPR and First Aid Certification.....	13
Member Slot Conversion Policy	14
Exiting a Member Prior to Completion of Service	15
Jury Duty for AmeriCorps Members.....	15
RECORDS STORAGE AND RETENTION.....	15
OnCorps Reports - General Use	15
OnCorps Reports - Timesheet Entry and Approval.....	16
Electronic Storage of Member Files	18
Records Retention Policy	19
COMPETITIVE GRANT APPLICANT SELECTION	19
Competitive Grant Applicant Selection Criteria.....	19

PROGRAM MANAGEMENT

National Service Criminal History Checks

Revised: May 31, 2016

It is the policy of the Missouri Community Service Commission that no individual in a covered position begin work or service supported by the grant prior to the request of a full National Service Criminal History Check (NSCHC). An individual in a covered position includes any person receiving a living allowance, stipend, National Service education award, or salary through a program receiving CNCS funds, regardless of the level of contact with a vulnerable population. (Note: An individual in a covered position includes AmeriCorps Members and applicable program staff.)

The criminal history check should be reviewed by the appropriate sub-grantee staff (e.g. the Program Director). Proof of the completed criminal history check must be placed in the corresponding Member or personnel file. Results of criminal history checks are to be maintained in a locked file cabinet with access limited to appropriate sub-grantee staff.

What is a National Service Criminal History Check (NSCHC)?

Per 45 CFR §2540.202, all NSCHCs must include two components:

1. A nationwide name-based check of the National Sex Offender Public Website (NSOPW). The NSOPW is a centralized system that identifies people who are registered as sex offenders in states, territories, or with many federally recognized Tribes; AND
2. Either a name- or fingerprint-based search of the statewide criminal history registry in the candidate's state of residence **and** in the state where the person will serve or work; OR a fingerprint-based FBI check.

For people with **recurring access to vulnerable populations**, sub-grantees must conduct an NSCHC with three components:

1. A nationwide name-based check of the NSOPW;
2. Either a name- or fingerprint-based search of the statewide criminal history registry in the candidate's state of residence **and** in the state where the person will serve or work; AND
3. A fingerprint-based FBI check.

NSCHC Online Introductory Course (Required): All sub-grantees **must** complete CNCS NSCHC training every year. The CNCS designated e-course provides a thorough overview of the requirements and can be found at: <http://cncstraining.articulate-online.com/4240214797>. The sub-grantee must identify at minimum one relevant staff person to fulfill this requirement on behalf of the program. The program must retain the certificate of completion and assign staff to retake the course annually prior to the expiration of the certificate. Programs should save certificates of completion from each year as part of grant record. For 2016, the sub-grantee should complete this requirement and be certified by December 31, 2016.

Detailed information on NSCHC requirements – including guidelines for individual NSCHC components, online trainings, FAQs, and for-profit vendor guidelines – may be found at <http://www.nationalservice.gov/resources/criminal-history-check>.

Failure to comply with this policy will result in a letter of non-compliance, adverse scoring on the annual risk assessment (which is considered for future funding requests), and disallowed costs.

Member Contracts

Established: May 20, 2011

Revised: May 26, 2016

The Missouri Community Service Commission requires sub-grantees to utilize a standardized Member Contract template provided by the Commission. Any program-specific additions, revisions, addendums, and/or changes made to the Member Contract must be reviewed and approved by the Commission prior to being signed by the AmeriCorps Member and Program Director.

It is the policy of the Missouri Community Service Commission that no sub-grantee will receive reimbursement for a Member who begins service prior to the date s/he signs the Member Contract. In order to be reimbursed, the Member **MUST** begin service on or after the date of their signed contract.

Failure to comply with this policy will result in a letter of non-compliance, adverse scoring on the annual risk assessment (which is considered for future funding requests), and the sub-grantee will not be reimbursed for service hours prior to the date on the signed Member Contract.

History

This policy is in accordance with Federal regulations.

Prohibited Activities

Revised: May 1, 2015

While charging time to the AmeriCorps program, accumulating service or training hours, or otherwise performing activities supported by the AmeriCorps program or CNCS, staff and Members may not engage in the following activities (*ref: 45 CFR §2520.65*):

- 1) Attempting to influence legislation;
- 2) Organizing or engaging in protests, petitions, boycotts, or strikes;
- 3) Assisting, promoting, or deterring union organizing;
- 4) Impairing existing contracts for services or collective bargaining agreements;
- 5) Engaging in partisan political activities, or other activities designed to influence the outcome of an election to any public office;
- 6) Participating in, or endorsing, events or activities that are likely to include advocacy for or against political parties, political platforms, political candidates, proposed legislation, or elected officials;
- 7) Engaging in religious instruction, conducting worship services, providing instruction as part of a program that includes mandatory religious instruction or worship, constructing or operating facilities devoted to religious instruction or worship, maintaining facilities primarily or inherently devoted to religious instruction or worship, or engaging in any form of religious proselytization;
- 8) Providing a direct benefit to—
 - a. A business organized for profit;
 - b. A labor union;
 - c. A partisan political organization;
 - d. A nonprofit organization that fails to comply with the restrictions contained in section 501(c)(3) of the Internal Revenue Code of 1986 related to engaging in political activities or substantial amount of lobbying except that nothing in these provisions shall be construed to prevent participants from engaging in advocacy activities undertaken at their own initiative; and

- e. An organization engaged in the religious activities described in paragraph (7) of this section, unless CNCS assistance is not used to support those religious activities;
- 9) Conducting a voter registration drive or using CNCS funds to conduct a voter registration drive;
- 10) Providing abortion services or referrals for receipt of such services; and
- 11) Such other activities as CNCS may prohibit.

AmeriCorps Members **may not** engage in the above activities directly or indirectly by recruiting, training, or managing others for the primary purpose of engaging in one of the activities listed above. Individuals may exercise their rights as private citizens and may participate in the activities listed above on their initiative, on non-AmeriCorps time, and using non-CNCS funds. Individuals should not wear the AmeriCorps logo while doing so.

Anti-Lobbying

Revised: May 27, 2015

The Commission of the Missouri Community Service Commission has a very active Legislative Education Committee (LEC) composed of commissioners who are 100% volunteers. Commissioners are able to contact legislators and educate them about the impact of AmeriCorps Missouri programs. Commissioners and/or legislators may attend special functions of your program as a way of demonstrating impact and providing face-to-face “education”. However, even during times when legislators are attending programs’ special functions, Members and paid program staff will not utilize this time to lobby any legislators. Questions may be answered if asked, but any influencing of legislation is prohibited.

Even though the regulations clearly state that this is a prohibited activity “*while charging time to the AmeriCorps program, accumulating service or training hours, or otherwise performing activities supported by the AmeriCorps program or CNCS, staff and Members may not engage in the following activities...*,” the Commission strongly recommends that AmeriCorps Members do not participate in these activities during their term of service and especially while wearing AmeriCorps gear.

Recommendation:

It is strongly recommended by MCSC that the Legislative Education Committee (LEC) be utilized to communicate to and to educate legislators. AmeriCorps program

staff, Commission staff, and AmeriCorps Members are NOT allowed to lobby or to give the perception of lobbying.

Reporting Deadlines

Revised: May 31, 2016

All sub-grantees must submit required reporting in a timely and efficient manner as follows:

Performance Measures Progress Reports are due quarterly as follows:

- First Quarter (August – December) – due January 15th
- Second Quarter (January – March) – due April 15th
- Third Quarter (April – June) – due July 15th
- Fourth Quarter (July – September) – due October 15th

Aggregate Financial Reports (AFRs) are due quarterly as follows:

- First Quarter (August – December) – due January 31st
- Second Quarter (January – March) – due April 30th
- Third Quarter (April – June) – due July 31st
- Fourth Quarter (July – September) – due October 31st

Periodic Expense Reports (PERs) are due monthly as follows:

- By the 15th day of the month following the month in which expenses are incurred (e.g. September expenses are due by October 15th).
- PERs are used as the basis for reimbursement requests.
- The sub-grantee is required to submit supporting documentation as requested for grant-related expenditures. Expenses shown in the sub-grantee's general ledgers and payroll registers must match what is reported on the PER. The sub-grantee's financial management system must adhere to the requirements outlined by MCSC.
- *Note: MCSC may deny reimbursement requests that are not received by the deadlines outlined and reserves the right to immediately terminate this grant agreement if the sub-grantee's request for reimbursement is more than two months delinquent.*

MCSC may notify sub-grantees at the beginning or during the program year of any revisions or additions to deadlines and/or reporting requirements.

MCSC may cease all disbursement of grant funds if the sub-grantee is more than two weeks delinquent with a programmatic or financial report. Consistent tardiness in reporting will be a consideration by the MCSC in determining the sub-grantee's future requests for funding. In the event of continued or unreasonable tardiness or inaccuracy, the MCSC may suspend and/or terminate the grant award as outlined in federal regulations.

Program Modification Request Requirements

Established: May 27, 2015

The sub-grantee must first obtain the prior written approval of MCSC before making any of the following changes:

1. Changes in the scope, objectives or goals of the program, whether or not they involve budgetary changes;
2. Substantial changes in the level of Member supervision;
3. Entering into additional sub-awards or contracts for AmeriCorps activities funded by the award, but not identified or included in the approved grant application and award budget.

FINANCIAL MANAGEMENT

Member Living Allowance

Revised: May 27, 2015

A living allowance is not a wage. Sub-grantees must not pay a living allowance on an hourly basis. Sub-grantees should pay the living allowance in regular increments, such as weekly or bi-weekly, paying an increased increment only on the basis of increased living expenses such as food, housing, or transportation. Payments should not fluctuate based on the number of hours served in a particular time period, and must cease when the Member's service ceases (*ref. 45 CFR §2522.245*).

If a Member serves all required hours and is permitted to conclude his/her term of service before the originally agreed upon end of term, the sub-grantee may not provide a lump sum payment to the Member. Similarly, if a Member is selected after

the program’s start date, the sub-grantee must provide regular living allowance payments from the Member’s start date and may not increase the Member’s living allowance incremental payment or provide a lump sum to make up any missed payments.

Example:

Scenario: The program design is a 10-month program with a living allowance of \$12,530, paid on a monthly basis of \$1,253 per month.

Member Situation	Length of Service	Amount per Month	Total Living Allowance Provided
Member A starts and finishes on time.	10 months	\$1,253	\$12,530
Member B starts on time and finishes one month early.	9 months	\$1,253	\$11,277
Member C starts late and finishes late.	10 months	\$1,253	\$12,530
Member D starts on time and finishes one month late.	11 months	\$1,253	\$12,530
Member E starts one month late and finishes on time.	9 months	\$1,253	\$11,277

Recommendations:

The program should establish a written policy that is reasonable. For example, if a Member comes on board within the first two weeks of the month, you might set policy that gives them the entire living allowance. If they start service later than that, you could prorate the amount based on the number of days in the month they will serve. The same would hold true for the end of service. If they leave within the first two weeks of the month, their living allowance is based on the number of days in the month they served. If they serve over the 2-week cut-off, they would get the full living allowance. You can establish different cut-off points as long as they are reasonable, documented in policy, and followed consistently.

To prevent instances of providing a living allowance to a Member who may not honor the expected time commitment, the program should incorporate a realistic view of time commitment into the Member Orientation, such as communicated the expected schedule to which the Member must adhere to successfully complete the term of service. Members, especially those who are enrolled in school or have other responsibilities, may not have a realistic view of the time commitment expected of him/her.

Unemployment Insurance

Revised: May 27, 2015

In 1995, the Department of Labor ruled that AmeriCorps Members were not entitled to unemployment compensation under the Federal Unemployment Tax Act, as there was no employer-employee relationship between AmeriCorps grantees and Members. While AmeriCorps Members were not entitled to benefits under federal law, they could still be eligible under state law.

Based on resources from the Division of Employment Security located within the Missouri Department of Labor and Industrial Relations, AmeriCorps Members are not qualified to receive unemployment compensation since a living allowance is not a wage but is a stipend, and AmeriCorps Members are not considered employees.

Mileage Reimbursement

Established: December 2, 2010

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that to be reimbursed for mileage on any reimbursement request the sub-grantee must comply with the state mileage reimbursement rate at the time of mileage accrual. If the sub-grantee will cover mileage from match funds, then the sub-grantee may use any mileage rate up to the federal mileage rate.

Current Reimbursement Rate

The current reimbursement rates can be found on the Office of Administration website or by clicking this link: <http://content.oa.mo.gov/accounting/state-employees/travel-portal-information/mileage>

History

The accounting department within the Department of Economic Development has notified the Missouri Community Service Commission that it is now only acceptable to reimburse at the state mileage reimbursement rate when requesting a reimbursement. The reimbursement rate is set by the State of Missouri Office of Administration.

Reimbursement for Meals and Lodging

Established: May 30, 2014

Revised: October 15, 2015

It is the policy of the Missouri Community Service Commission that, to be reimbursed for meals and/or lodging on any reimbursement request, the sub-grantee must comply with the per diem rates established by the Missouri Department of Economic Development (*effective 1/1/2011*) and the lodging rates established for the State of Missouri at the time of expenditure accrual.

Meals

In-State Travel (Meals): Per diem rates for travel within the State of Missouri are as follows:

Locality	Breakfast	Lunch	Dinner	TOTAL
Jefferson City	\$6	\$10	\$18	\$34
Columbia	\$6	\$10	\$18	\$34
Springfield	\$6	\$10	\$18	\$34
Kansas City	\$8	\$12	\$24	\$44
St. Louis	\$6	\$11	\$20	\$37
Other	\$6	\$10	\$18	\$34

Grantee Share Note: The State of Missouri per diem limits do not apply to in-state travel expenditures attributed to Grantee Share. The sub-grantee may use any per diem rate under the federal standard rate as follows:

Primary Destination	County	Meals & Inc. Expenses*
Standard Rate	Applies for all locations without specified rates	\$41
Kansas City	Jackson, Clay, Cass, Platte	\$64
St. Louis	St. Louis City, St. Louis County, St. Charles, Crawford, Franklin, Jefferson, Lincoln, Warren, and Washington	\$37

**Incidental expenses included at \$5.*

***Reference: <http://www.gsa.gov/portal/content/100120>.*

Out-of-State Travel (Meals): Per diem rates for travel outside the State of Missouri may be found at [http://content.oa.mo.gov/sites/default/files/Per Diem Rates.pdf](http://content.oa.mo.gov/sites/default/files/Per_Diem_Rates.pdf).

Compliance (Meals while in Travel Status): Meals will be reimbursable when travel is in a 12-hour status and when a meal is not otherwise provided as follows:

- **Breakfast:** On the day of departure if travel status begins no later than 7:00 a.m. plus any other day until return.
- **Lunch:** On the day of departure if travel status begins no later than 10:00 a.m. plus any other day where travel status continues past 2:00 p.m. until return.
- **Dinner:** On the day of departure if travel status begins no later than 5:00 p.m. plus any other day where travel status continues past 7:00 p.m. until return.

Compliance (Meals for Trainings/Meetings): Program staff and Members required to attend a business meeting or required training over a meal period and are not in 12-hour status may claim reimbursement for the expense provided the proper documentation is provided. Documentation includes itemized receipts, a meeting/training agenda, and a sign-in sheet to verify attendance.

Lodging

In-State Travel (Lodging): The current lodging rates for the State of Missouri are as follows:

Primary Destination	County	Max Lodging (excluding taxes)
Standard Rate	Applies for all locations without specified rates	\$89
Kansas City	Jackson, Clay, Cass, Platte	\$112
St. Louis	St. Louis City, St. Louis County, St. Charles, Crawford, Franklin, Jefferson, Lincoln, Warren, and Washington	\$125

Out-of-State Travel (Lodging): Information regarding lodging rates outside the State of Missouri may be found at <http://www.gsa.gov/portal/category/104711>.

Incidentals: Incidental expenses are limited to \$3 per day and include luggage handling (not to exceed \$1 per bag/box) and maid service (at no more than \$1 per night for stays longer than one night).

History

Per the Travel and Associated Reimbursement Policy (revised 10/1/2014), the policy applies to all Department of Economic Development entities.

Purchasing Equipment with Federal Funds

Established: September 29, 2010

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that sub-grantees should not purchase office equipment such as laptops, printers, copiers and other office equipment with federal funds. Equipment is defined as tangible, non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

Equipment Purchase Requirements:

- Sub-grantees are not allowed to purchase office equipment with federal funds.
- At no time should a sub-grantee reallocate funds to purchase office equipment.
- Sub-grantees must be aware that the use of funds must be in compliance with the CNCS grant terms and conditions as well as with the MCSC policies.

History

The September 2010 policy reflects concerns from sub-grantees in reference to allowed equipment purchases. It is the sincere desire of the Missouri Community Commission to clearly define the acceptable uses of federal funds for equipment costs. This policy is based on information gathered from compliance visits and reviews conducted by the Missouri Community Service Commission staff.

Budget Modification Request Requirements

Established: September 29, 2010

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that sub-grantees must meet the following requirements when submitting budget modifications.

- Budget modification requests must be approved by your Program Officer.
- An itemized budget for the reallocation of funds must be submitted.
- Funds/requests must meet the Missouri Community Service Commission and Corporation for National and Community Service policies, terms and conditions.
- Sub-grantees may not move more than 10% of their budget from sections I & II without prior approval from the Missouri Community Service Commission.

History

This September 2010 policy reflects the new budget modification policy. In the past, sub-grantees were not utilizing the budget modification process effectively. The use of federal funds is governed by the CNCS and the MCSC. The use of federal funds must be in compliance before and after budget modifications. The MCSC must ensure that all sub-grantees are following the budget modification process when considering the reallocation of federal funds.

MEMBER MANAGEMENT

CPR and First Aid Certification

Established: February 4, 2011

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that all AmeriCorps sub-grantees have their Members certified in CPR and First Aid by the end of their first quarter of service. If a sub-grantee has fully enrolled all awarded Member slots at the commencement of the project period, then it is expected that the CPR and First Aid performance measures will be met by the end of the first quarter. If a sub-grantee has rolling enrollment after the first quarter of the project period, then Members must receive CPR and First Aid certification within the quarter they are enrolled (*e.g. a Member enrolled during the second quarter of the project period must receive CPR and First Aid training by the end of the second quarter*).

CPR Certification Performance Measure

One-hundred percent (100%) of Members will receive CPR certification. *[Program Name]* will utilize *[training method or source]* to certify Members, and *[instrument]* to record Member progress. A copy of *[file record type]* will be placed in the Member file upon completion.

First Aid Certification Performance Measure

One-hundred percent (100%) of Members will receive First Aid certification. *[Program Name]* will utilize *[training method or source]* to certify Members, and *[instrument]* to record Member progress. A copy of *[file record type]* will be placed in the Member file upon completion.

History

The Missouri Community Service Commission wants to ensure that the Members are trained early so that they are able to handle emergency situations as they arise throughout their service year.

Member Slot Conversion Policy

Established: May 27, 2015

Revised: May 26, 2016

In an effort to maximize the enrollment of all awarded Member slots during a grant year (365 days of service) and to minimize the cumulative effects of what has been referred to as “rolling enrollment,” the Missouri Community Service Commission expects that all AmeriCorps State programs will enroll all awarded slots within the first 90 days of the budget period, with the exception of slots designated for summer programming. Any Member slot unfilled as of the 91st day of the budget period that is not designated for summer programming is subject to conversion to a lesser required service hour slot (e.g. full-time to less-than-full-time) if the sub-grantee plans to utilize the Member slot during the grant year.

As of the 91st day, unfilled Member slots not designated for summer programming may also be forfeited for the benefit of other AmeriCorps programs within the same prime grant at the discretion of the Commission. The Commission will notify the program in advance to facilitate an approved transfer of an unfilled slot to another AmeriCorps program. Since this is a rare occurrence, AmeriCorps programs should expect to be fully accountable for enrolling all awarded Member slots.

For filled Member slots, under no circumstance may a program convert a filled slot to a lesser required service hour slot after the 90th day of a Member’s term of service

as it will be perceived as converting a slot so a Member can receive an education award, which is unallowable.

Exiting a Member Prior to Completion of Service

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that sub-grantees notify their assigned Program Officer when you first become aware of a circumstance in which a Member will be released prior to the agreed upon completion date or number of hours noted in the Member Contract.

In accordance to *45 CFR §2522.230*, an AmeriCorps program may release a participant from completing a term of service for compelling personal circumstances, as determined by the program, or for cause.

Under no circumstances will a Member receive an education award if s/he does not complete his/her term of service and does not meet the guidelines for a compelling personal circumstance as outlined in *45 CFR §2522.230*.

Jury Duty for AmeriCorps Members

Established: May 26, 2016

The sub-grantee must allow AmeriCorps Members to serve on a jury without being penalized for doing so. During the time AmeriCorps Members serve as jurors, they should continue to receive credit for their normal service hours, a living allowance, health care coverage, and, if applicable, child care coverage regardless of any reimbursements for incidental expenses received from the court.

RECORDS STORAGE AND RETENTION

OnCorps Reports - General Use

Established: October 8, 2009

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that sub-grantees adhere to the following guidelines for use of the OnCorps Web-based Reporting System (<http://mo.oncorpsreports.com>):

Procedural

- The sharing of passwords is not permitted. This includes program staff, Members, and administration. Sharing passwords between the groups mentioned above is also not permissible.
- It is strongly recommended that sub-grantees enter Member information into the OnCorps system within 30 days of the commencement of service.

Note: If there is a priority conflict, Members should be entered into the My AmeriCorps Portal within 30 days of the commencement of service first.

OnCorps Help Desk Tickets: Sub-grantees must not submit help requests directly to the OnCorps Reports Help Desk unless instructed to do so by a MCSC staff member. The sub-grantee is to send the help request via e-mail to the assigned MCSC Program Officer and await further instruction.

History

OnCorps Reports is a computerized reporting system chosen by the Commission in order to fill the gap that was left when the Corporation reduced WBRS functionality during the 2008-2009 program years. The OnCorps Reports system serves as a centralized reporting structure for key programmatic functions. It has no direct relationship with the Corporation for National and Community Service. It is a tool used to report key information to the Commission in a timely manner.

OnCorps Reports - Timesheet Entry and Approval

Established: October 8, 2009

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission that sub-grantees ensure Member timekeeping for service hours in the OnCorps Reports system is kept current within the established margins. This policy is applicable to all MCSC sub-grantees, regardless of their official timekeeping system of record.

The margins are:

- Members must have no more than 200 time sheet hours pending approval.
- Full-time Members “avg/wk needed” must be no more than 45/wk.
- Part-time Members “avg/wk needed” must be no more than 25/wk.

Note: Sub-grantees may track Member timekeeping progress in the OnCorps Reports system by viewing “Time Tracking > Member Service Hours > Member Total Hours by Date.”

These margins are the basis for Member timekeeping compliance as reflected in:

- Monthly desk monitoring reports;
- Drawdown sheet used by the Commission in consideration of sub-grantee reimbursement requests; and
- Monthly reporting of sub-grantee issues made to the Program Committee (the Committee of MCSC Commissioners that determines funding recommendations to the Corporation; this committee meets monthly with Commission staff via conference call).

Sub-grantees are responsible for assuring that Member timekeeping is entered according to the system of record established in their Member Contracts.

Exception: Professional Corps may request an Alternative Timekeeping Protocol from CNCS. The written approval must be provided to MCSC prior to the commencement of the project period.

History

This October 2009 policy reflects the faster pace and ease of entry now that electronic signatures are a recognized and acceptable method for Member timekeeping. Program Directors were given the opportunity to comment on Program monitoring timelines and “red flags” established for OnCorps in a session at the June 2009 Program Director training. This policy is a formalization of monitoring practices implemented since that meeting.

Previous Policy (as introduced in 2007 for the WBRS system):

AmeriCorps sub-grantees must enter monthly time logs for all Members by close of business (5:00 pm) of the last day of the following month. If the last day falls on a holiday or weekend, then the time logs should be entered by the end of business of the next working day.

Electronic Storage of Member Files

Established: June 5, 2014

Revised: May 25, 2015

It is the policy of the Missouri Community Service Commission that if sub-grantees choose to store Member files electronically, then they must follow the Corporation's policy on electronic storage of Member files listed below.

Background:

Typically programs store Member eligibility documentation, timesheets, and other relevant documents in paper files which become cumbersome to maintain and store. Programs have asked if electronic storage is permissible. Sections 1703 and 1705 of the Government Paperwork Elimination Act (GPEA) state that electronic records are not to be denied legal effect, validity, or enforceability merely because they are in electronic form.

Policy:

This policy allows AmeriCorps State and National grantees the option of storing Member files in electronic formats, when practicable. It also provides minimum standards that such systems must meet.

Minimum Standard for Electronic Document Storage:

A program may store Member files electronically and use electronic signatures if the program can ensure the validity and integrity of the record and signature is maintained.

The program's electronic storage procedures and system must provide for the safekeeping and security of the records, including:

1. Sufficient prevention of unauthorized alterations or erasures or records;
2. Effective security measures to ensure that only authorized persons have access to records;
3. Adequate measures designed to prevent physical damage to records; and
4. A system providing for back-up and recovery of records; and

The electronic storage procedures and system must provide for the easy retrieval of records in a timely fashion, including:

1. Storage of the records in a physically accessible location;
2. Clear and accurate labeling of all records; and

3. Storage of the records in a usable, readable format.

NOTE: All current grant terms and conditions regarding recordkeeping, including access restrictions, security, privacy, and retention, also apply to electronic records.

Records Retention Policy

Revised: May 31, 2016

It is the policy of the Missouri Community Service Commission that all records be retained as follows:

- All financial records, supporting documentation, statistical records, evaluation and performance data, Member information, and personnel records must be retained for three (3) years after the close of an AmeriCorps grant.
- If any litigation, claim, negotiation, audit or other action involving records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.
- *Note: It is recommended that sub-grantees retain Member information and records for seven (7) years after the completion of a Member's term of service.*

This policy applies regardless of the status of the sub-grantee organization's AmeriCorps State funding.

COMPETITIVE GRANT APPLICANT SELECTION

Competitive Grant Applicant Selection Criteria

Established: January 1, 2012

Revised: May 28, 2015

It is the policy of the Missouri Community Service Commission (MCSC) that applicants interested in submitting applications for competitive grants are selected 'by invitation only'. These decisions are made by MCSC staff and Commissioners.

To be considered for the competitive grant application process, a sub-grantee must possess the following criteria:

- The sub-grantee must have been in the MCSC's portfolio for a period of typically three years.
- The sub-grantee must not have had recent staff turnover.
- The sub-grantee must have no outstanding compliance issues.
- The sub-grantee must have a very good Member enrollment rate.
- The sub-grantee must have a very good Member retention rate.
- The sub-grantee must demonstrate positive and substantial impact in its community and/or neighborhood.
- Member enrollment must be performed in a timely fashion as described by AmeriCorps grant terms and conditions.
- Member exits must be performed in a timely fashion as described by AmeriCorps grant terms and conditions.
- The sub-grantee director and appropriate staff must respond to Commission staff in a timely manner (within 2 business days).
- All performance measure and financial reports must be submitted in a timely manner (on or before due dates) and must be accurate.
- The sub-grantee must have a low score on the annual risk assessment (classification of low risk) to be considered.