

Volunteer Tennessee Policy

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POLICY: AWARD LETTER RECEIPT AND CONTRACT GENERATION

Federal grant award letters are critically important as the official obligation of the federal funder to the state to support approved services. Proper processing of the award letter is part of the foundation for sound fiscal management. Once received, any contracts waiting to be generated, can begin the process.

System for when Award letter arrives:

- 1) Executive Director receives email “Grant Award Notification from CNCS”.
- 2) Executive Director forwards notification to program officer and OBF, noting the project to which the award should be posted.
- 3) Program Officer saves electronic copy to appropriate grant file on the H:/ drive.
- 4) Program Officer reviews the award for:
 - General accuracy
 - Specific dollar amount compared to the grant application

If there are any discrepancies or changes needed, the program officer should follow-up with CNCS.

- 5) Program Officer checks CNCS web site for provisions and reviews the provisions for:
 - Any policy changes in the provisions
 - Deadlines for any reports
- 6) Program Officer uses the award letter and provisions to double check contracts and budgets and to note any changes in Title VI or IX provisions.
- 7) Program Officer notes any report deadlines in their own calendar and provides the dates and information to Executive Director.

System for Generating a Sub-grantee’s Contract:

- 1) The Program Officer completes the appropriate fields in the contract tracking sheet <H:\RDS\AMERI\Contracts\Process\Open Contract Status.xlsx>. Make sure that all information is accurate. Refer to the application provided by the grantee.
- 2) The Program Officer uses the contract process manual <H:\RDS\AMERI\Contracts\Process\Volunteer Tennessee Contract Process Manual.docx> to generate the draft contract.
- 3) The Executive Director reviews the contract generated by the Program Officer for accuracy. Make special note of the contract dates, amount, scope of services, contact information, and attachments. Also, make sure the legal applicant name is correct throughout the grant. Return noting any changes to the Program Officer.

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- 4) The Program Officer will then facilitate the process, sending the contract to be reviewed, to be signed the grantee and other relevant parties, and then providing copies of the contract to all who need one.
- 5) The final executed contract should be filed electronically in the official program files.

Updated 8/2020

POLICY: CHECK & CASH RECEIPT

Volunteer Tennessee regularly receives checks from sub-recipients for refunds on overpayment of a grant or for repayment of questioned cost; from attendees of the Tennessee Conference on Volunteerism and Service-Learning for registration fees; and from attendees of the Governor's Volunteer Stars Awards for ticket fees. Volunteer Tennessee occasionally receives cash, most often from attendees of the Governor's Volunteer Stars Awards for ticket fees, or from attendees of the Tennessee Conference on Volunteerism and Service-Learning for registration fees. According to F&A Policy 25, Deposit Practices (https://www.tn.gov/content/dam/tn/finance/documents/fa_policies/policy25.pdf), checks and cash received must be deposited immediately (within 24 hours for \$500 or more, or within 5 working days for \$100-\$499.99). Volunteer Tennessee should log and process checks within the guidelines of the policy.

Mailed Check Procedures:

In general, the Executive Director (“person opening the mail”) will open mail and begin the processing of checks. When the ED is out of the office, other staff members will check the mail; however, the person who opens mail and initiates the processing of checks should not be directly involved in the program or event related to the check. For example, AmeriCorps Program Managers should not open refund checks from AmeriCorps sub-recipients.

1. The person opening the mail will immediately stamp “For Deposit Only” on the back of the check, record the check in the check log binder, and scan and make a hard copy of the check.
2. If a check is received without identifying information, the person opening the mail will follow step 1 and then inform the Program Manager, who will try to find the source and purpose of the check. When the purpose is known, either continue with step 3, or if appropriate, return the check to the sender.
3. The person opening the mail will send a scanned copy of the check and hand deliver the original check and one hard copy of it to the Program Manager. If the Program Manager is out of the office or away from his/her desk, the person opening the mail will keep the check in a locked drawer until the Program Manager returns. If the Program Manager will be away from the office for an extended period of time that would prevent delivery of the check to OBF within 24 hours of its receipt, then the person opening the mail will request that another Program Manager process the check.
4. The Program Manager will save to the H: drive the scanned copy of the check. For instance, remittances due to monitoring will be saved in the monitoring folder for that program. The Program Manager will also code the check for deposit in the appropriate Project with a cover memo and print a copy of the memo.
5. The Program Manager will hand deliver the cover memo and original check to OBF (e.g. Mark Foley, Armond Harris, Lisa Von Haeger) within 24 hours. The receiver in OBF will initial and date the copy of the check to verify receipt of the check. If the Program Manager is not able to immediately process the check, the Program Manager will keep the check in a locked drawer until he/she can process it.

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6. The Program Manager will file the initialed copy in the check log as proof of OBF receipt and fill out the remainder of the check log to record the date it was sent to OBF and the person who received it in OBF.

Off-site Check and Cash Procedures:

1. The person receiving the check or cash (“cash receiver”) will write a receipt from the receipt register using the next numbered receipt in the sequenced receipt register and insuring that the payee’s name, the receiver’s name, the amount, the date, the check number (if applicable), and purpose for payment are recorded on the receipt.
2. The cash receiver will give the top copy of the receipt to the payee and ensure that the duplicate in the receipt register is legible.
3. The cash receiver will immediately stamp or write “For Deposit Only” on the back of any checks. The cash receiver will put the check or cash in the cash box, which will always be locked when not in use.
4. At the end of the event, the cash receiver will complete the Cash Reconciliation Report (<H:\RDS\AMERI\Admin\FORMS\Cash Reconciliation Report.docx>). The cash receiver will then give the Cash Reconciliation Report, the receipt register, and cash box to the “reconciler”, who will reconcile the checks and cash with the receipt register in the presence of the cash receiver and the lead staff person for the event (“event lead”). When the reconciler completes the reconciliation, the reconciler, the event lead and the cash receiver will sign the Cash Reconciliation Report and give the signed report to the Executive Director. The event lead will then take possession of the receipt register and cash box and keep them in a secure location until he or she returns to the office.
5. As soon as the event lead returns to the office, he or she will deliver the checks to the person opening the mail. The person opening the mail will follow the “Mailed Check Procedures” and return the processed checks and cash to the lead.
6. The event lead will hand deliver the original cover memo, original checks, cash, a copy of the cover memo, a copy of the Cash Reconciliation Report, and a copy of the checks to OBF (e.g. Mark Foley, Armond Harris, Lisa Von Haeger) within 24 hours of returning to the office. The receiver in OBF will initial on the copy of the checks and Cash Reconciliation Report that he/she received the originals and the cash. The event lead will file the initialed copies in the check log as proof of OBF receipt. The event lead may also save a scanned copy of the checks. If the event lead is not able to immediately process the checks and cash, the event lead will keep the checks and cash in a locked drawer until he/she can process the funds.
7. The event lead will fill out the remainder of the check log sheet in the check log binder to record the date it was sent to OBF and the person who received it. Once a quarter, the person opening the mail should scan the check log file and save it on the H: drive.

Revised 3/2020

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POLICY: CONFLICT OF INTEREST

- 1) Each Volunteer Tennessee (the Commission) board member and staff member shall avoid any action, whether or not specifically prohibited by statute or regulation, which might result in or create the appearance of:
 - i. Using public office for private gain;
 - ii. Giving preferential treatment to any person;
 - iii. Impeding government efficiency or economy;
 - iv. Losing complete independence or impartiality;
 - v. Making a government decision outside of official channels; or
 - vi. Affecting adversely the confidence of the public in the integrity of the government.
- 2) Use of information. No board member or staff member shall, directly or indirectly:
 - i. Use, disclose, or allow the use of official information which was obtained through or in connection with his or her appointment to, or employment by, the Commission and which has not been made available to the general public for the purpose of furthering the private interest or personal profit of any person, including the Commission member or staff member;
 - ii. Under any circumstances, assist an organization in the preparation of a grant application, except to take part in a Commission-approved program of technical assistance that is equally available to all potential applicants; or
 - iii. Engage in a financial transaction as a result of, or primarily relying upon, information obtained through his or her commission appointment or employment.
- 3) Use of government property. No board member or staff member shall make use of the facilities, equipment, personnel, or supplies of the State or its agencies for private use or gain, except to the extent that the use is incidental or *de minimis* or is lawfully available to the general public.
- 4) The board member or staff member will avoid all known conflicts of interest, and to the extent he or she becomes aware of a conflict of interest in connection with any matter brought before the Commission on which he or she serves, he or she will disclose such conflict to the Commission and will further recuse himself or herself from participating in any consideration of the matter.
- 5) While serving on the commission, the board member or staff member will not participate in any considerations or actions involving individuals in his or her immediate family, individuals employed by him or her, or his or her organization, services provided by him or her, or his or her organization, or any other matter in which his or her participation may create an appearance of bias or impropriety.
- 6) While serving on the commission, the board member or staff member will not participate in any considerations or actions involving the provision of funds or education awards to an organization, or any program or entity funded under the same funding category, if the member is currently, or was within one year of the submission of a grant application to the Commission: an officer, a director, a trustee, a full-time volunteer, or an employee of an organization submitting a grant application to the Commission.
- 7) When a board member or staff member is in doubt as to the proper interpretation of this conflict of interest statement, he or she is expected to seek the advice of the Volunteer Tennessee Executive Director or General Counsel of the TN Department of Finance & Administration.

Updated 10/2020

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POLICY: CONTRACT CLOSEOUT & RECONCILIATION

After each contract expires or contract is terminated, the Program Manager (PM) must close it out. Closeout means that the contract has been satisfied and the official files are complete, including a final invoice and summary progress report, Financial Status Report (FSR) if applicable, and signed statements of residual supplies inventory and equipment bought with grant funds.

- 1) **Develop Closeout Memo:** The memo should request all that is required to closeout the grant and an appropriate deadline to have the required materials returned to the Volunteer Tennessee.

The memo should be addressed to the program contact person and a copy should be sent to the official sub-grantee applicant. It also must include the contract number.

- 2) **Provide Invoice amounts.** The closeout memo should include the total amount reimbursed to date. If the final invoice has not yet been reimbursed, make a note of the expected maximum amount on the final invoice.
- 3) **Include all forms.** The closeout forms must be sent with each closeout memo. FSR, Residual Supplies, and Equipment Inventory are the three forms to be sent, unless the PM also requests a progress report summary.
- 4) **Email the closeout memo and forms.** The PM should email the closeout memo and forms within 60 days of the expiration date of the contract.
- 5) **Follow-up.** The PM should follow-up with each contract about 1 week in advance of the deadline with a reminder that closeout documents are due. If the documents are not received by the deadline, the PM should follow-up within a day of the due date. The PM should continue timely follow-up until documents are received.
- 6) **Process.** Once all closeout documents have been received, the following must be done to process the documents:
 - a. Make sure all the documents have appropriate signatures.
 - b. If the final invoice was not sent before the end of the contract and was sent with the closeout documents, process the invoice accordingly.
 - c. Make sure the FSR is completed accurately.
 - d. Make sure the final FSR amount matches Edison and Office of Business and Finance (OBF) records. Contact OBF for the final amount, once the final invoice has cleared.
 - e. Double check that no residual supplies or equipment inventory of \$5,000 or more are left over. If not, the forms should say "None" or "Not applicable".

- 7) **Develop Final Closeout Letter.** Once all documents have been reviewed and are on file, making sure the final invoice has appeared on the Edison reports, develop the Final Closeout Letter to be signed by the Executive Director. The letter should be addressed to the legal applicant and a copy sent to the program contact person. Identify the contract number in the letter and note which items have been received.

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The final closeout letter should include language stating that, despite the contract being closed out, the sub-grantee is responsible for retaining all records for three years and that the State reserves the right to audit and/or question any aspect of the contract and to request and receive any refunds as a result of later actions.

- 8) **Review.** The Volunteer Tennessee ED should review the letter and program file to make sure the files include:
 - A) contract;
 - B) audit report;
 - C) monitoring report, if applicable;
 - D) invoices;
 - E) correspondence;
 - F) final FSR; and
 - G) closeout certifications on supplies & equipment.

- 9) **Send & file final closeout letter.** The PM should:
 - A) send the signed closeout letter to the contract agency; and
 - B) file a copy in the official file.

Updated 10/2020

POLICY: FRAUD OR ABUSE REPORTING

Volunteer Tennessee is committed to high standards of honesty and integrity. If, however, at any time you should see something that does not seem right, please do investigate or report to your supervisor or his/her supervisor. If, however, your concern relates to something that you do not feel comfortable discussing with management, there are a couple of confidential reporting routes that you may take.

1. Speak confidentially to F&A Assistant Commissioner Buddy Lea, departmental representative to Volunteer Tennessee.
2. Call and speak confidentially to an Executive Committee board member:
Chair, Vice-Chair, Treasurer, or Secretary.

For contact information, see <H:\AMERI\Board\Volunteer TN Board Database.xls>.
Executive Committee members are at the top of the page with their positions noted.

Serious conditions or situations should also be reported to the Office of the Inspector General of the Corporation for National & Community Service or the TN Office of the Comptroller at 1-800-232-5454. See <http://www.cncsoig.gov/> for the federal CNCS IG contact information.

Revised 8/2020.

POLICY: GRANT FINANCIAL TRACKING

Volunteer Tennessee tracks monthly grant expenditures through its Budget versus Actual (BvA) spreadsheets, according to the monthly Edison financial reports. The Executive Director reviews the BvAs on a monthly basis to ensure that the budgets are on track for the year and that costs are within budget. Any notable issues are discussed with the Board Chair and Treasurer.

Operational grant (e.g. Commission Support Grant) Federal Financial Reports (FFRs) and PMS reports are prepared by the Office of Business and Finance. Passthrough program grant (AmeriCorps cost-reimbursement grants) FFRs are prepared by the AmeriCorps Program Manager. To ensure accuracy, the ED verifies that totals on the FFRs match Volunteer Tennessee's grant awards.

Updated 8/2020

POLICY: GRIEVANCE PROCESS

According to 45 CFR Part 2540.230, any national service participant, labor organization or other interested individual may file a grievance related to the operations of Volunteer Tennessee. The process is outlined below. Civil service employees of Volunteer Tennessee also have recourse to due process in the disciplinary process as outlined in the "Employee Information" on the Department of Finance & Administration website.

1. Complaint. Submit the complaint in writing to Volunteer Tennessee no later than one year after the date of the alleged occurrence. If the complainant is an AmeriCorps member whose contract specifies a local grievance process, Volunteer Tennessee will refer the member to their agency process. For grievances against the commission, the address is:

Volunteer Tennessee
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 18th Floor
Nashville, TN 37243-1102
Phone: 615-253-1426
Fax: 615-741-1789

2. Fraud or Criminal Activity. If the complaint alleges fraud or criminal activity, it must be immediately brought to the attention of the Inspector General of the Corporation for National and Community Service. There is no time limit on grievances against such activity. The Inspector General's address is:

Inspector General
Corporation for National and Community Service
1201 New York Avenue, NW
Washington, DC 20525

3. Nondiscrimination. It is against the law for organizations that receive federal financial assistance from the Corporation for National and Community Service to discriminate on the basis of race, color, national origin, disability, sex, age, political affiliation, or, in most programs, religion. It is also unlawful to retaliate against any person who, or organization that, files a complaint against such discrimination.

In addition to filing a complaint with local and state agencies that are responsible for resolving discrimination complaints, you may bring a complaint to the attention of the Corporation for National & Community Service. If you believe that you or others have been discriminated against, or if you want more information, contact the state commission as shown in #1 above or contact the federal agency at:

Equal Opportunity Office
Corporation for National & Community Service
1201 New York Avenue, NW
Washington, D.C. 20525
202-606-5000 x 312 (voice); 202-565-2799 (TDD)

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202-565-2816 (fax); eo@cns.gov (email)

4. Informal resolution. Within 15 days of receipt of the complaint, a representative of Volunteer Tennessee shall contact the complainant to seek an informal resolution. Such efforts shall consist of sharing information explaining Volunteer Tennessee action and/or identifying a mutually agreeable neutral party to facilitate alternative dispute resolution such as mediation or facilitation. It is expected that most complaints will be misunderstandings that can be resolved through informal communication.

5. Alternative dispute resolution. Complainants may choose alternative dispute resolution or proceed directly to the grievance process (step 5). If ADR is chosen, proceedings must be initiated within 45 calendar days of the alleged occurrence. If mediation, facilitation or other alternative dispute resolution processes are selected, the process must be aided by a neutral party who, with respect to the issue in controversy, functions specifically to aid the parties in resolving the matter through a mutually achieved and acceptable written agreement. The neutral party may not compel a resolution. Proceedings before the neutral party must be informal, and the rules of evidence will not apply. With the exception of a written and agreed upon dispute resolution agreement, the proceedings must be confidential. If the matter is resolved, and a written agreement is reached, the complaint will agree to forego filing a grievance in the matter under consideration.

6. Grievance procedure for unresolved complaints. If the matter is not resolved within 30 days from the date the informal dispute resolution process began, the neutral party must inform the aggrieving party of his or her right to file a formal grievance. In the event an aggrieving party files a grievance, the neutral party from the informal resolution process may not participate in the formal complaint process. In addition, no communication or proceedings of the informal dispute resolution process may be referred to or introduced into evidence at the grievance arbitration hearing. Any decision by the neutral party is advisory and not binding unless both parties agree.

7. Hearing. Upon the filing of a formal written grievance with Volunteer Tennessee, a hearing before a neutral party must be held within 30 days. A decision on any such grievance must be made no later than 60 calendar days after the filing of the grievance.

8. Arbitration. If there is an adverse decision against the party who filed the grievance, or if 60 calendar days have passed after the filing of the grievance and no decision has been reached, then the filing party may submit the grievance to binding arbitration before a qualified arbitrator who is jointly selected and independent of the interested parties. If the parties cannot agree on an arbitrator within 15 calendar days after receiving a request from one of the grievance parties, the CEO of the Corporation for National and Community Service will appoint an arbitrator from a list of qualified arbitrators.

An arbitration proceeding must be held no later than 45 calendar days after the request for arbitration, or, if the arbitrator is appointed by the CNCS CEO, the proceeding must occur no later than 30 calendar days after the arbitrator's appointment.

A decision must be made by the arbitrator no later than 30 days after the date the arbitration proceeding begins.

The cost of the arbitration proceeding must be divided evenly between the parties to the arbitration. If, however, the grievant prevails, Volunteer Tennessee must pay the total cost of the proceeding and the attorney's fees of the prevailing party.

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9. Enforcement. A suit to enforce arbitration awards may be brought in any Federal district court having jurisdiction over the parties without regard to the amount in controversy or the parties' citizenship.

Updated 7/2008

POLICY: MATCH DOCUMENTATION

Volunteer Tennessee follows the requirements for match in [2 CFR § 200.306](#). The sources and types of match are described below.

Sources:

- 1) State
- 2) Non-state

Types:

- 1) Cash
- 2) In-kind

All match must be documented as follows:

State cash match:

When the new Speedchart, Program, and Project are established at the beginning of a new three-year Commission Support Grant (CSG), the “Activity” will be designated as 50% FEDERAL and 50% STATE. This creates an automatic 50/50 split of FEDERAL/STATE for any expenses charged to the CSG. State cash match is then recorded in Edison as expended for the CSG. The Office of Business and Finance will create semi-annual Edison reports of expenditures from the General Ledger showing the FEDERAL/STATE share of the expenditures. The STATE cash match amount from the General Ledger is reported, along with non-state cash and in-kind match, in the “Recipient share of expenditures” on the CSG Federal Financial Report.

Non-state cash match:

All non-state cash must be deposited following the “Check and Cash Receipt” policy, including F&A Policy 25, Deposit Practices, and designated for deposit in the appropriate Project. Allowable expenses are then charged against the appropriate Project and recorded in Edison. The responsible Volunteer Tennessee staff will save electronic copies of invoices/receipts for these expenses to the appropriate location on the shared drive. The Executive Director or the Office of Business and Finance will create semi-annual Edison reports of expenditures from the General Ledger showing the total expenditures for the non-state cash Projects. The non-state cash match amount from the General Ledger is reported, along with State cash and in-kind match, in the “Recipient share of expenditures” on the CSG Federal Financial Report.

All in-kind match:

All in-kind match must be documented using a signed in-kind contribution form. The responsible Volunteer Tennessee staff will save electronic copies of in-kind contribution forms to the appropriate location on the shared drive. The Executive Director will enter the in-kind amounts on the “Commission Support BvA” Excel workbook and provide the total in-kind amount semi-annually to the Office of Business and Finance. The in-kind match amount is reported, along with State cash and non-state cash match, in the “Recipient share of expenditures” on the CSG Federal Financial Report.

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POLICY: MONITORING RESOLUTION

Report issuance:

1. Monitoring Coordinator (MC) issues report to program and copies Executive Director (ED), appropriate Program Manager (PM), and Comptroller's Office comptroller.state.audit@cot.tn.gov.
2. MC enters "# Findings", "# Observations", "Questioned Federal Costs", "Questioned Matching Share", and "Date Report Issued" on the Monitoring Follow-up Tracking Sheet <H:\AMERI\Monitoring\Program Monitoring\Monitoring Follow-up Tracking Sheet.xlsx>.
3. The "Date Corrective Action Due" will auto-populate in the Monitoring Follow-up Tracking Sheet for 15 business days after issuance; however, the PM may need to adjust the due date for holidays.

If corrective action plan is received within 15 business days:

1. On the same day the corrective action plan is received, PM generates simple acknowledgement of receipt to the program via email and copies response to the ED. The acknowledgement will commit to a Volunteer Tennessee response within 5 business days of receipt of the corrective action plan.
2. PM enters "Date Corrective Action Received" on the Monitoring Follow-up Tracking Sheet and follows resolution steps below.
3. The "Date Initial Staff Response Due" will auto-populate in the Monitoring Follow-up Tracking Sheet for 5 business days after receipt of the corrective action plan; however, the PM may need to adjust the due date for holidays.

If corrective action plan is not received within 15 business days:

1. PM follows up with program as needed regarding corrective action plan and copies ED.
2. Once corrective action is received, PM enters "Date Corrective Action Received" on the Monitoring Follow-up Tracking Sheet and follows resolution steps below.
3. The "Date Initial Staff Response Due" will auto-populate in the Monitoring Follow-up Tracking Sheet for 5 business days after receipt of the corrective action plan; however, the PM may need to adjust the due date for holidays.

Resolution steps if the corrective action plan is sufficient:

1. PM reviews the corrective action plan for sufficiency and generates draft Volunteer Tennessee response for ED review within 4 business days of receipt of the plan.
2. Within five business days of receipt of the corrective action plan, PM notifies the program in the Volunteer Tennessee response that resolution is complete and copies ED. If PM does not follow up within five business days of receipt of the corrective action plan, ED generates a reminder to PM.
3. PM enters "Date of Last VT Response" and "Corrective Action Resolved" on the Monitoring Follow-up Tracking Sheet.
4. Monitoring resolution statement is included within yearly closeout letter to program.

Resolution steps if the corrective action plan is not sufficient:

1. PM reviews the corrective action plan for sufficiency and generates draft Volunteer Tennessee response for ED review within 4 business days of receipt of the plan.

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2. Within five business days of receipt of the corrective action plan, PM notifies the program in the Volunteer Tennessee response that additional action is needed within 5 business days and copies ED. If PM does not follow up within five business days of receipt of the corrective action plan, ED generates a reminder to PM.
3. PM enters “Date of Last VT Response” on the Monitoring Follow-up Tracking Sheet.
4. If corrective action plan is not received within 5 business days, PM follows up with program and copies ED.
5. PM continues to follow steps 1-4 until the program sufficiently resolves the monitoring report.
6. Once the corrective action plan is sufficient, PM follows “Resolution steps if the corrective action plan is sufficient” above.

Timing standards:

Monitoring report issuance: within 30 business days of the final day of on-site review or receipt of additional documentation submitted by sub-grantee.

Corrective action plan from program: within 15 business days of receipt of monitoring report.

Corrective action plan receipt acknowledgement: same day of receipt of corrective action plan.

Draft Volunteer Tennessee response for internal review: within 4 business days of receipt of corrective action plan.

Volunteer Tennessee response to program: within 5 business days of receipt of corrective action plan.

Additional corrective action plan response from program: within 5 business days of receipt of Volunteer Tennessee response.

Updated 10/2020

POLICY: PRE-AWARD RISK ASSESSMENT FOR NEW GRANT APPLICANTS

In order to determine if a potential grantee complies with Title VI of the Civil Rights Act of 1964; is responsible and financially stable; has a history of performance and a management and a financial system which provides adequate accounting for allowable and unallowable costs, documentation of expenditures, allocation of costs, cash management, etc., Volunteer Tennessee will conduct a pre-award risk assessment of all new grant applicants.

As part of the pre-award risk assessment, Volunteer Tennessee will require that all new grant applicants complete a financial management survey (<H:\AmeriCorps\AC Funding Process Files\Pre-Award Risk Assessment Process\CNCS FM Survey.doc>); send their most recent IRS Form 990 and most recent OMB A-133 audit report (or audited financial statements if the agency does not meet the requirement for an A-133 audit); and describe their Title VI compliance activities (see “Sample Memo to new applicant RE pre-award review” – <H:\AmeriCorps\AC Funding Process Files\Pre-Award Risk Assessment Process\Sample Memo to new applicant RE pre-award review.doc>). To the extent practicable, the Program Officer will request this information from the new applicants at least three weeks before the Volunteer Tennessee funding vote meeting.

The Program Officer will send the completed financial management survey, Form 990, audit report and Title VI compliance response to the Monitoring Coordinator for review at least one week prior to the Volunteer Tennessee funding vote meeting (see “Sample Memo to Monitor RE pre-award review” – <H:\AmeriCorps\AC Funding Process Files\Pre-Award Risk Assessment Process\Sample Memo to Monitor RE pre-award review.doc>). The Monitoring Coordinator will summarize the assessment of risk for the board meeting and highlight any significant findings and concerns. Staff will provide the risk assessment summary to the Volunteer Tennessee Board prior to the funding vote meeting.

Updated 7/2013

POLICY: RECORDS MANAGEMENT

Volunteer Tennessee (VT) program managers are responsible for each federal or private grant that VT receives related to that manager's assigned program(s). Assignments are reflected on the contract roster <H:\RDS\AMERI\Contracts\Process\Open Contract Status.xlsx>. Program managers are responsible for overall management of their grants, including subgrants, reporting, monitoring and **records management**. Federal grant files must be retained for 3 years after submission of the final Federal Financial Report.

1. Award letters. When a grant award letter is received (paper or eGrants), the Program Manager is responsible for making an electronic copy for the appropriate grant file. The Program Manager develops an email memo noting which Edison program(s) the award should be applied too and forwards the award letter and provisions to the Fiscal Officer in the Office of Business & Finance, copying the ED.

OBF Fiscal Officer. Enters data from award letters into state fiscal system resulting in VT's ability to obligate and spend against the awards.

Program Manager. Enters data from grant award letters and amendments into the Federal Closeout Schedule <H:\RDS\AMERI\Closeouts\Federal Closeout Schedule.xlsx>. Keeps grant award letters and budget, provisions, amendments, related correspondence and closeout notice in electronic file. Responsible for implementation of the grant according to the award letter budget and program provisions. Maintains an official file that includes:

- Federal Request For Proposal or Notice of Funds Available
- Copy of the VT's official application
- Copy of VT board minutes that reflect approval of budget and any other mentions of grant in commission board minutes
- Award letter and provisions
- Grant award amendments
- Related notices from or correspondence with funder
- Budget vs. actual spreadsheet that reconciles to grant total, if appropriate
- Progress Reports, FFRs and feedback, if any, submitted to CNCS

When close-out is complete, the grant files (paper and electronic) should be clearly labeled and archived.

2. Subgrant allocation process. Program Managers are responsible for maintaining files on the funding allocation process of any subgrants. Funding allocation files should contain:

- Commission board process authorization, if appropriate
- Funding process timeline
- Notice of funding availability
- List of agencies and media that received notice of funding availability
- Request for Proposals, including review criteria
- Documentation of any grant information or technical assistance meetings
- Original subgrantee applications
- Staff review guide and completed forms
- Peer review process documentation, if needed
- Roster of peer reviewers

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- Peer reviewer training documentation
- Peer review forms
- Signed conflict of interest statements of peer reviewers
- Recommendations to the VT board
- Pre-award financial risk assessments for new programs
- Signed conflict of interest statements of VT board members and staff
- Board minutes documenting board authorizations
- Any relevant correspondence

3. Subgrants. Program Managers are responsible for maintaining official files on each subgrant made through their grant(s). Subgrant files should contain:

- Signed contract
- Most recent copy of agency audit
- If needed, documentation of indirect cost rate
- Risk Assessments and Monitoring reports. (Note: Program Officer must also save a copy of each Risk Assessment with the Monitoring Plan central office files.)
- Corrective action plans or other responses to monitoring reports
- Progress reports and feedback
- Financial reports and feedback
- Site Visit agendas, tools and feedback
- If appropriate, invoices and match documentation
- Any related grievance process files
- Correspondence
- Closeout report, including initial request, closeout documentation, final closeout letter and budget versus actual, if applicable.

4. Implementation Documentation. Program Managers are responsible for maintaining official files for all implementation objectives, such as training events and outreach efforts. Files for documentation of achieving grant objectives should contain, but are not limited to:

- Agendas
- Sign-in Sheets
- Evaluations
- Handouts
- Invoices

5. Official Files of the Monitoring Plan. Each program manager should save one electronic copy of each program risk assessment in the appropriate Monitoring plan folder (H:\AMERI\Monitoring\Program Monitoring). The plan, risk assessments and related files are to be stored in the appropriate Monitoring plan folder.

Updated 8/2020

POLICY: SAME-DAY MULTIPLE FUEL PURCHASE

If a long-distance trip necessitates multiple fuel purchases on the same day, send a written explanation on the multiple fuel purchases to Linda Deason in the Office of Business and Finance.

Updated 2/2009

POLICY: STATE PLAN PROCESS

Volunteer Tennessee pursues its mission by mobilizing and prioritizing three primary resources: board members, financial support, and partners. Each resource is strategically mobilized based on the three-year State Plan, which then devolves to the annual board action plan and individual grant plans.

In the third and final year of each State Plan, Volunteer Tennessee develops a new, three-year State Plan in compliance with the requirements in 45 CFR 2550.80(a):

- (A) is developed, through an open and public process (such as through regional forums, hearings, and other means) that provides for maximum participation and input from the private sector, organizations, and public agencies, using service and volunteerism as strategies to meet critical community needs, including service through programs funded under the national service laws;
- (B) covers a 3-year period, the beginning of which may be set by the State;
- (C) is subject to approval by the chief executive officer of the State;
- (D) includes measurable goals and outcomes for the State national service programs in the State consistent with the performance levels for national service programs as described in section 179(k);
- (E) ensures outreach to diverse community-based agencies that serve underrepresented populations, through established networks and registries at the State level, or through the development of such networks and registries;
- (F) provides for effective coordination of funding applications submitted by the State and other organizations within the State under the national service laws;
- (G) is updated annually, reflecting changes in practices and policies that will improve the coordination and effectiveness of Federal, State, and local resources for service and volunteerism within the State;
- (H) ensures outreach to, and coordination with, municipalities (including large cities) and county governments regarding the national service laws; and
- (I) contains such information as the State Commission considers to be appropriate or as the Corporation may require.

The plan is shaped in public input meetings around the state with National Service programs and other stakeholders. Volunteer Tennessee conducts at least one public input meeting in each of the State's three Grand Divisions (East, Middle, West). Using the public input, the Volunteer Tennessee board develops the draft plan in several commission board meetings and officially approves the final plan in the final quarterly board meeting in the calendar year that precedes the start of the new plan. At the final quarterly board meeting each year, Volunteer Tennessee creates annual targets for the upcoming year based on the State Plan. At the final quarterly board meeting each year, Volunteer Tennessee reviews the State Plan and makes any necessary updates and changes.

Updated 4/2017

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POLICY: SUB-GRANTEE APPLICATION REVIEW

In order to ensure high-quality programs and compliance with rules and regulations, Volunteer Tennessee staff shall review all sub-grantee applications for funding. After reviewing the applications, staff will prepare a recommendation for the board that includes staff and peer reviewer scores. In making the recommendation to the board, the staff will ensure the use of the published selection criteria.

Application Review:

New/Re-competing - The staff review of new/re-competing applications covers the following basic areas: compliance with published application instructions, compliance with grant requirements and prohibited activities, adherence to budget guidelines, compliance with performance measure requirements, adherence to cost per Member Service Year (MSY) limit (if applicable), and demonstration of cost effectiveness. **At least two staff members will review each application.**

For the AmeriCorps Competitive process, the staff will produce feedback based on the staff review. Staff will provide the feedback to each applicant with sufficient time for the applicants to make revisions prior to the Competitive submission deadline. The feedback will include any compliance issues; spelling, grammar and punctuation errors; and continuous improvement issues. If possible, the Training Officer will provide feedback on training issues.

Continuations - The staff review of continuation applications covers the following basic areas: compliance with published application instructions, compliance with grant requirements and prohibited activities, adherence to budget guidelines, compliance with performance measure requirements, and adherence to cost per MSY limit (if applicable).

As part of the application review, staff will do the following: determine whether the application complies with the application requirements, such as deadlines, completeness, and order of information; ensure that any proposed changes comply with all grant requirements (e.g. prohibited activities); and conduct a careful review of the budget to check for allowability, compliance with federal regulations, reasonableness, cost per MSY (if applicable), and mathematical correctness.

For the AmeriCorps Competitive process, the staff will produce feedback based on the staff review. Staff will provide the feedback to each applicant with sufficient time for the applicants to make revisions prior to the Competitive submission deadline. The feedback will include any compliance issues; spelling, grammar and punctuation errors; and continuous improvement issues.

Staff Recommendation:

Staff will prepare a recommendation for the Grants Committee that includes the requested amount of funding, the recommended funding level for each applicant, the staff and review team scores (for new/re-competing applicants), and the cost per MSY (if applicable). The staff recommendation will consider performance results of continuation and re-completing programs. If the staff determines that there are gaps in the existing portfolio in terms of the distribution of programs across the state, diversity of program models, diversity of issue areas, areas of need, or Corporation priorities, staff will note if any applicants can fill the gaps. Pending approval of the Grants Committee, staff will prepare a recommendation to be submitted to the board for its approval.

Updated 8/2020

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POLICY: SUB-GRANTEE FINANCIAL & PROGRESS REPORT REVIEW

The Program Officer (PO) reviews each program Financial Status Report (FSR) for timeliness, budgeted federal expenses vs. actuals, budgeted match vs. actuals, and cost per MSY(if applicable). The PO compares reported actual expenditures with Edison reports to check for lags in drawdowns or any other discrepancies. The PO calls program fiscal officers and OBF to reconcile any discrepancies and prepares a feedback report for each program. Programs receive the written feedback prepared by the PO approximately 2-4 weeks following the FSR due date. If the FSRs have significant errors, the PO asks the program for a revised report.

The PO reviews each program Progress Report (PR) for timeliness, performance, potential prohibited activities, and other compliance issues. Programs receive the written feedback prepared by the PO approximately 2-4 weeks following the PR due date.

POLICY: SUB-GRANTEE GRIEVANCE PROCESS REVIEW

Program officers will review grievance policies annually prior to program start dates and provide feedback to programs.

The Monitoring Coordinator will review grievance policies during risk-based monitoring reviews.

POLICY: SUB-GRANTEE SINGLE AUDIT REVIEW

Volunteer Tennessee relies on the state system through the Comptroller's Office Division of Municipal Audit to identify sub-grantees that expend \$750,000 or more in federal funds through the state and are required to have a single audit. The Comptroller's Audit Manual describes the requirements and process.

Volunteer Tennessee reviews the Comptroller's Office reports of state sub-grantees annually and notes which agencies are required to have the single audit.

While Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) places the responsibility for identifying all federal funds on the entity receiving the funding and provides that pass-through organizations like Volunteer Tennessee are only responsible for the federal awards they make, in fact, Volunteer Tennessee requests audits from all its sub-grantees to maximize financial accountability. Most Volunteer Tennessee sub-grantees find it advantageous to have an audit to demonstrate accountability for private as well as public funding sources whether they hit the \$750,000 threshold or not. In addition to the collection and review of single audits, Volunteer Tennessee's monitor also reviews audits as part of the risk-based, on-site monitoring program and documents the review in her workpapers.

1. Annually, the Program Manager (PM) requests the level of federal funding from subgrantees.
2. If a single audit is required, PM requests that the agency submit its most recent single audit. If a single audit is not required, the PM requests any other audit report.
3. On receipt of the audit, the PM notes receipt of the audit on the appropriate tracking tool.
4. The PM reviews the audit for any findings related to Volunteer Tennessee funding.
5. After review, the PM follows up with the agency on any issues noted during the review.

Updated 8/2020

POLICY: TITLE VI

Volunteer Tennessee will not discriminate against its program beneficiaries or participants on the basis of race, color, sex, religion, ancestry, national origin, age, disabilities, or veteran status as required by applicable federal and state laws and regulations. Parties who wish to file a complaint against Volunteer Tennessee for violation of Title VI of the Civil Rights Act of 1964 under 42 U.S.C. § 2000d, T.C.A. § 4-21-904 or any other federal and/or state law (i.e., Title VII, ADA, Section 504, etc.) should direct such complaints to either the Tennessee Human Rights Commission, United States Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity, or the United States Equal Employment Opportunity Commission.

POLICY: WORK TIME AT CONFERENCES/MEETINGS

Volunteer Tennessee staff may count the time for attendance at conference workshops, sessions and plenaries and travel time to and from the conference. Time for receptions, social events and meals (unless it is a working lunch or breakfast) is **not** allowable. Although receptions, social events and meals are often valuable in terms of networking and gathering information, we must be able to justify what we count as work time to our harshest critics. Receptions, social events and meals do not pass this muster (and could even possibly be considered "waste" or "abuse" under Tennessee's Fraud, Waste and Abuse statute).