

**Office of Inspector General  
Corporation for National and  
Community Service**

**AUDIT OF THE VOLUNTEERS IN SERVICE TO  
AMERICA MEMBER SUPPORT UNIT (VMSU)**

**OIG REPORT 10-16**



*Corporation for*  
**NATIONAL &  
COMMUNITY  
SERVICE** 

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This report was issued to Corporation management on June 14, 2010. Under the laws and regulations governing audit follow-up, the Corporation is to make final management decisions on the report's findings and recommendations no later than December 14, 2010 and complete its corrective actions by June 14, 2011. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.



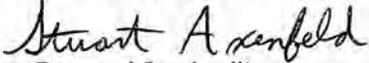
## OFFICE OF INSPECTOR GENERAL

June 14, 2010

TO: Patrick A. Corvington  
Chief Executive Officer

Paul Davis  
Acting Director, AmeriCorps\*VISTA

Jerry Thompson  
Director, VISTA Member Support Unit

FROM: Stuart Axenfeld   
Assistant Inspector General for Audit

SUBJECT: Office of Inspector General (OIG) Report 10-16: *Audit of the Volunteers in Service to America Member Support Unit (VMSU)*

Attached is the final report on the OIG's audit of the VMSU. This audit was performed by OIG staff in accordance with generally accepted government auditing standards.

Under the Corporation's audit resolution policy, a final management decision on the findings in this report is due by December 14, 2010. Notice of final action is due by June 14, 2011.

If you have questions pertaining to this report, please contact me at (202) 606-9360 or [s.axenfeld@cncsoig.gov](mailto:s.axenfeld@cncsoig.gov); or Thomas Chin, Audit Manager, at (202) 606-9362 or [t.chin@cncsoig.gov](mailto:t.chin@cncsoig.gov).

### Attachment

cc: James Siegal, Chief of Staff  
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## TABLE OF ACRONYMS

ARRA	American Recovery and Reinvestment Act of 2009
C.F.R.	Code of Federal Regulations
Corporation	Corporation for National and Community Service
CSO	Corporation State Office
DL	Driver's License
DVSA	Domestic Volunteer Service Act of 1973
HQ	Headquarters
IST	In-service Training
Legal Residency	U.S. Citizen, National or Legal Permanent Resident Alien Status
NCSA	National Community Service Act of 1990
OFL	Office of Field Liaison
OIG	Office of Inspector General
PII	Personally Identifiable Information
SSN	Social Security Number
TCB	Terms, Conditions, and Benefits Certification
U.S.C.	United States Code
VDR	VISTA Desk Reference
VISTA	Volunteers in Service to America
VMSU	VISTA Member Support Unit

## **EXECUTIVE SUMMARY**

The Office of Inspector General (OIG), Corporation for National and Community Service (Corporation), performed an audit of the Volunteers in Service to America (VISTA) Member Support Unit (VMSU), which is located in Austin, Texas. Our objectives were to determine whether member files were complete; payments of living allowances, education awards, and stipends were supported; personally identifiable information was protected; and internal controls were adequate.

The Corporation established VMSU in October 2007 to provide administrative support to VISTA members and alumni; and it serves as the repository for VISTA member files. The Director of VMSU reports directly to the Director of the Office of Field Liaison (OFL) in Washington, DC. A review team, which was comprised of Corporation staff from the OFL and VISTA Headquarters (HQ), conducted a site visit in March 2009 to assess operations at the VMSU and determine how the VMSU was handling its current workload, managing VISTA member files, and supporting VISTA members and alumni, as well as to assess whether the VMSU was prepared to meet the demands of an increase in the number of VISTA members serving as a result of the American Recovery and Reinvestment Act. The review team concluded that 35 percent of the files it sampled were not complete. Documents missing from member files included citizenship documentation; sponsor recommendation; and Terms, Conditions, Benefits (TCB) Certifications.

Our site visit during the week of December 14, 2009 provided results similar to the results of the Corporation's review team's March VMSU visit. We randomly selected and reviewed for completeness the files of 40 VISTA members serving at any time between October 1, 2008, and December 9, 2009. Thirty-five percent of the member files we sampled were not complete. In addition, 15 percent of the sampled member files were missing multiple documents. Missing documents included the VISTA Oath of Service, TCB Certifications, and documentation of citizenship, national or legal permanent resident alien status (hereafter referred to as legal residency).

The Corporation's responses to recommendations in a draft of this report generally met the intent of the recommendations. However, in some instances, the responses did not specifically address the recommendations. We summarized the Corporation's responses to each recommendation in the body of the report, which are followed by our comments. The Corporation's verbatim response to the draft report is included as Appendix A.

## **AUDIT CONCLUSIONS**

Member files maintained by the VMSU were not complete. We verified that payments for living allowances, education awards, and stipends were valid and supported by appropriate evidence. The VMSU did not have written operating policies and procedures. However, Personally Identifiable Information (PII) was adequately safeguarded. VMSU's lack of approved operating policies and procedures is an internal control weakness.

Neither the Corporation, VISTA HQ, nor VMSU have issued specific guidance for VMSU operations. The VMSU does not have written operating policies and procedures in place that provide guidance and define its' purpose. However, an unfinished draft VMSU

Policies and Procedures Manual was provided to the OIG during the VMSU site visit. Because VISTA does not have specific implementing guidance regarding legal residency and eligibility requirements for VISTA members, 19 of the 40 VISTA members sampled may receive end of service education awards for which they may not be eligible to receive (see finding 4).

We found that, although the VMSU is responsible for maintaining member files, VMSU employees are not responsible for ensuring members complete the documents or for collecting documents directly from members. The VMSU can only make requests to Corporation State Offices (CSOs) to forward missing paperwork (electronic or hard copy) for inclusion in a member's file. Further, the VMSU does not have the authority to return incomplete documents or forms to the CSOs and require the CSOs to properly complete and/or sign the forms. The following table provides a summary of missing or unsigned documents identified during our review of selected member files.

<b>SUMMARY OF MISSING OR UNSIGNED DOCUMENTS</b>		
<b>Form</b>	<b>Missing</b>	<b>Unsigned</b>
Oath of Service (V-55)	1	0
Designation of Beneficiary for Unpaid Wages (SF1152)	3	21
Terms, Conditions and Benefits Certification	4	0
Future Plans/Early Termination (V-732)	4	4
Employee's Withholding Allowance Certificate (W-4)	4	0
Life Insurance Designation of Beneficiary (CNCS A-582)	3	0
Proof of Citizenship/Permanent Legal Resident Alien	3	0
Use of Vehicles or Public Transportations (V-81)	0	1

## **RESULTS OF AUDIT**

### **Finding 1. The VMSU lacked approved written operating policies and procedures.**

Although the Corporation established the VMSU in October 2007 at the time of our site visit, during the week of December 14, 2009, the VMSU did not have written operating policies and procedures in place. The legislation under which the VISTA program operates is the Domestic Volunteer Service Act of 1973, Pub. L. 93-113, 42 United States Code (U.S.C.) §§4950-5084 (DVSA). This law, as amended by the Serve America Act of 2009, Pub. L. 111-13, outlines the purpose and parameters within which VISTA may operate. The statute is very broad, leaving the details of implementation of the statute to the Corporation. Unlike other AmeriCorps programs, many aspects of the AmeriCorps\*VISTA program have not been further defined through the implementation of regulations by the Corporation.

The Corporation has posted the AmeriCorps\*VISTA Desk Reference (VDR) on its internal website. The VDR serves as a compendium of policies and procedures, training and orientation manual for new staff, and a reference tool for staff. The VDR is considered a living document and has several chapters in an "in preparation" status. The VDR does not specifically address the operations of the VMSU, but does provide indirect guidance related to VISTA members. VMSU employees learn VMSU practices by on-the-job training, team meetings, and other correspondence. However, the

absence of implementing regulations and clear written policies and procedures could lead to inconsistent interpretation and application of the DVSA and VMSU policies and procedures.

## **Recommendations**

We recommend that the Corporation:

- 1a. Establish VISTA regulations that implement applicable public law; and
- 1b. Approve written operating policies and procedures for the VMSU.

## **Corporation Response**

The Corporation agrees with the recommendations and is in the process of revising its regulations, which are currently located at 45 C.F.R., Chapter XII. Specific VMSU procedures will be implemented through internal policy and guidance. On January 15, 2010 the Director of the OFL signed off on the VMSU's written operating policies and procedures.

## **OIG Comment**

The Corporation's planned actions meet the intent of the recommendations. However, as of January 15, 2010, the VMSU's written operating policies and procedures included sections that were not complete. The Corporation should ensure the approved written operating procedures for the VMSU do not contain any sections that are incomplete and that the operating procedures address the entire scope of the VMSU's operations.

## **Finding 2. Member files were missing one or more documents and documentation in member files lacked required signatures.**

Of the 40 member files we reviewed, 14 files (35 percent) had missing documents; and 6 files (15 percent) had two or more missing documents.

The VISTA program does not have formal guidance regarding VISTA member file maintenance. We created a list of required documents based on two sources: 1) a March 2001 Microsoft Word document found on the Corporation's website titled "*file documentation*;" and 2) the VMSU Director's statements. The March 2001 *file documentation* includes the End of Service Trust Form which is no longer used. We determined that complete member files should contain hard copy or electronic documentation, as follows:

- Member application with references and Sponsor Evaluation (including verification of legal residency)
- Oath of Service (V-55)
- Terms, Conditions, and Benefits (TCB) Certification
- Employee's Withholding Allowance Certificate (W-4)
- Earned Income Credit Advance Payment Certificate (W-5), if applicable

- Designation of Beneficiary for Unpaid Compensation of Deceased Civilian Employee (SF 1152)
- Designation of Beneficiary or Waiver for CNCS Life Insurance (CNCS Form A-582)
- AmeriCorps\*VISTA Member Benefits Election Form (OMB 3045-0054)
- Use of Vehicles or Public Transportation (V-81), if applicable
- Correspondence both with and about the member (for example termination for cause letters), if applicable
- Second Choice Prior to 10<sup>th</sup> Month AmeriCorps\*VISTA Member Benefits Election Form, if applicable
- Health Care Enrollment form (optional)
- Future Plans or Early Termination Request (V-732)

The VMSU employees are responsible for maintaining official member files. However, VMSU employees are not responsible for ensuring that members complete their documents or for collecting documents directly from members. The VMSU is limited to requesting that CSOs or VISTA sponsors collect and forward missing paperwork (electronic or hard copy) for inclusion into the members' files. Further, the VMSU does not have the authority to return incomplete documents or forms to the CSOs and require the CSOs to properly complete and/or sign the forms. The VMSU's total reliance on CSOs or VISTA sponsors to provide all applicable documents, completed and signed, is a major factor contributing to incomplete member files.

To be eligible to receive an education award, VISTA members must demonstrate legal residency. The files of three members lacked evidence that legal residency had been verified. Incomplete member files impair the ability of Corporation staff to validate a member's eligibility for VISTA service and ensure members are not receiving living allowances and stipends or education awards to which they are not entitled. A table listing the sampled member files with missing documents is located in Appendix B.

Twenty-four (60 percent) of 40 member files sampled contained one or more documents that were missing signatures. Twenty-one of the Designation of Beneficiary for Unpaid Compensation of Deceased Civilian Employee forms (SF 1152) lacked the signature of a Corporation employee. The signature is necessary to certify that: (1) Corporation personnel reviewed the designation; (2) designated shares totaled 100 percent; and (3) no one that signed as a witness was designated as a beneficiary. In addition, one SF 1152 also lacked beneficiary information and witness signatures. The instructions for the Designation of Beneficiary for Unpaid Compensation state that, to be valid, the agency must receive the form prior to the employee's death. Four Future Plans or Early Termination Requests (V-732) were missing signatures. One V-732 lacked the Program Specialist's signature, one was missing the member's signature, and two lacked signatures approving re-enrollment. The Use of Vehicles or Public Transportation (V-81) form in one member's file lacked the approval signature. In general, forms are not valid until signed. A table listing the sampled member files with unsigned documents is located in Appendix C.

Many of the documents included in a member's file are completed during the application process or at the pre-service orientation and collected by CSO personnel. The documents, when received by the VMSU, often do not have the necessary signatures and the Corporation lacks procedures that would authorize and require the VMSU to

return the documents to the CSOs for signatures. Documents lacking proper signatures may allow members to receive compensation or benefits to which they are not entitled; or may result in the erroneous denial of benefits to which members are entitled.

## **Recommendations**

We recommend that the Corporation require:

- 2a. The VMSU, in its approved written policies and procedures, to request missing, incomplete or unsigned documents from CSOs or VISTA sponsors; and document and track the request and receipt of missing, incomplete or unsigned documents;
- 2b. The VMSU, in its approved written policies and procedures, to notify the Directors of VISTA and OFL, of instances in which CSOs and VISTA sponsors are overdue in responding to requests for missing or incomplete documents; and
- 2c. CSOs and VISTA sponsors return requested documents, complete and signed, to the VMSU in a timely manner.

## **Corporation Response**

The Corporation agrees with the recommendations. It currently requests missing documents via e-mail and places them in the member's file when received. On May 19, 2010, the Director of the OFL issued a memorandum to CSOs requiring that they comply with VMSU requests for missing documents.

## **OIG Comment**

The Corporation's response generally meets the intent of the recommendation. The May 19, 2010 memorandum gives the VMSU's Director the authority to request missing, incomplete, or unsigned documents from CSOs and urges the CSOs to provide requested document(s) to the VMSU in a timely manner. In its response, however, the Corporation did not address how the Corporation would track the request and receipt of missing, incomplete, or unsigned documents. In addition, as part of its planned corrective action for recommendation 1b, the Corporation should determine what member documentation should be maintained by VISTA sponsors that have been authorized to pay subsistence allowances directly to members.

## **Finding 3. Member serving without Oath of Service in the current member file.**

One of the sampled files we reviewed did not have a copy of the member's Oath of Service. Unlike other AmeriCorps programs, VISTA members are not required to sign a contract of service; instead, VISTA members take an Oath in accordance with DVSA § 4954. *Terms and periods of service*. The Oath is essentially the member's contract with the Corporation. According to VMSU personnel, VISTA applicants should not be activated if the VMSU employee does not have a copy of their Oath. The Oath is the only document that, if missing, would prevent VMSU employees from activating a VISTA member. The VISTA program lacks regulation and policies and procedures that confirm the VMSU's statement as to whether the Oath must be in the member's file prior to

activating the member. Without a properly signed Oath, the member is not obligated to abide by the VISTA rules and regulations.

The member in question served multiple terms on different projects with and without a break in service. If a member serves multiple terms without a break in service, they are not required to re-take the Oath. The member in question has more than one member file because of the multiple terms of service and different projects. The member is currently serving without a break in service and would not have been required to re-take the Oath. The member's Oath may be in the member's file for a previous project on which the member served, now in archived records. We did not request to examine archived files.

### **Recommendation**

We recommend that the Corporation, for VISTA members serving multiple terms:

3. Retain a copy of the Oath of Service from the prior term or a newly executed Oath of Service in the members' current file.

### **Corporation Response**

Members who serve multiple terms do so without a break in service. Therefore, the Member Registration (Oath of Service) would be in the member's file. The Corporation will require that a new Oath of Service is executed for VISTA alumni with more than a 12-month break in service.

### **OIG Comment**

The Corporation's planned action to ensure that an Oath of Service is in the member's file meets the intent of this recommendation.

### **Finding 4. Documentation used to establish citizenship or permanent resident alien status was missing or insufficient.**

The files of 30 members lacked support demonstrating that they were eligible to receive education awards as VISTA members. Three member files lacked supporting documentation of any kind that showed that legal residency was verified. In addition, the documentation used to verify the legal residency of 27 members was insufficient because only a driver's license (DL) with a Social Security Number (SSN) was used in 26 instances. In the remaining instance, only a foreign passport was used. A table listing the sampled member files with insufficient or missing proof of legal residency is located in Appendix D.

Section 146 of the National Community Service Act of 1990, as amended (NCSA), 42 U.S.C. 12602, requires that to be eligible for an education award an individual must be a citizen or national or lawful permanent resident alien of the United States. The Code of Federal Regulations 45 C.F.R. § 2526.10(a) *Eligibility for an Education Award* also requires that "[a]n individual is eligible to receive an education award from the National Service Trust if the individual – [i]s a citizen, national, or lawful permanent resident alien of the United States..." Section 123 of the NCSA, 42 U.S.C. 12573, also states that "[t]he Corporation may approve of any of the following service positions as an approved

national service position that includes the national service educational award described in subtitle D of this subchapter as one of the benefits to be provided for successful service in the position: ... [a] position involving service as a VISTA volunteer under title I of the Domestic Volunteer Service Act of 1973 (42 U.S.C. 4951 et seq.)”

45 C.F.R. § 2522.200 provides for use of specific documents to establish legal residency for title C programs. VISTA is not a title C program and similar regulations specific to VISTA do not exist. Because legal residency is required for National Service Trust positions and AmeriCorps\*State, National, and VISTA positions (when an education award is selected) are all National Service Trust positions, we assert that the documents used to establish status should be equally rigorous.

A DL and SSN are not among the specific documents listed in 45 C.F.R. § 2522.200 that establish legal residency. Depending on the state of residence, legal residency is not required to obtain a driver’s license; and a SSN, in some instances, can be issued for persons who are not citizens or legal permanent resident aliens. 45 C.F.R. § 2522.200 permits the use of unspecified secondary documents with the written approval of the Corporation. When asked for a specific documents approved by VISTA to verify legal residency, the Director of VISTA provided a document titled “Documentation of Members as a U.S. Citizen, National or Permanent Resident.” This document gives blanket approval for CSOs and VISTA sponsors to use a DL and SSN to verify status. VISTA’s “Documentation of Members as a U.S. Citizen, National, or Permanent Resident” form states that in lieu of primary documentation (List A), providing a secondary document from List B **and** one from List C is acceptable. A DL is included in List B and a Social Security Card is included in List C. The Corporation could not provide documentation authorizing or provide the rationale for including documents in Lists A, B, or C. A foreign passport is not included in Lists A, B or C.

Of the 27 members whose legal residency is questionable, 18 members elected to receive an end-of-service education award. Additionally, one of the three members for whom documentation of legal residency verification was missing elected to receive an education award. Verifying the legal residency of VISTA applicants by using a document or combination of documents that can be issued to persons without legal residency may allow ineligible individuals to receive education awards to which they are not entitled.

## **Recommendations**

We recommend that the Corporation:

- 4a. Establish specific guidance and regulation, in coordination with finding 1a, regarding the documents CSOs and sponsors use to verify VISTA applicants’ U.S. citizenship, national, or legal permanent resident alien status for the VISTA program that are similar to the requirements in 45 C.F.R. §2522.200; and
- 4b. Follow the requirements in 45 C.F.R. §2522.200 until specific guidance and rationale or justification has been established regarding primary and secondary documents that verify U.S. citizenship, national, or legal permanent resident alien status has been established for the VISTA program.

## Corporation Response

The VMSU is currently following the citizenship verification policies of VISTA. VISTA is working with the Office of General Counsel to ascertain if the documentation recommended by the OIG is appropriate for use by VISTA.

## OIG Comment

We acknowledge VISTA's service eligibility requirements differ from other AmeriCorps programs. In addition, the end-of-service benefit options for VISTA members do not have the same eligibility requirements. However, in order for a VISTA member to select the education award as their end-of-service benefit, the member must meet the same requirements as AmeriCorps State and National participants. 45 C.F.R. § 2526.10(a) *Eligibility for an Education Award* requires that "[a]n individual is eligible to receive an education award from the National Service Trust if the individual – [i]s a citizen, national, or lawful permanent resident alien of the United States..." Individuals can obtain a driver's license and Social Security card without being a citizen, national, or lawful **permanent** resident alien of the United States. Our review of VISTA member files did not provide evidence that a separate verification was performed to ensure that members selecting the end-of-service education award were eligible to it.

## OBJECTIVE, SCOPE, AND METHODOLOGY

We conducted this audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

The objectives of the audit were to determine whether VISTA member files were complete; payments of living allowance were supported by validated information; education awards and stipends earned were supported; PII was adequately protected; and internal controls were adequate. The audit focused on activities, transactions, and events related to VMSU operations that are a result of the American Recovery and Reinvestment Act (ARRA) of 2009. Non-ARRA activities were also included.

We selected a sample of 40 VISTA members (serving at any time between October 1, 2008 and December 9, 2009) and reviewed their files for completeness and documented whether all required files, electronic and hard copy, were present in the member files. We interviewed VMSU management and staff. We reviewed policies and procedures related to operation of the VMSU. We conducted our audit between December 14, 2009 and April 13, 2010.

## BACKGROUND

AmeriCorps\*VISTA is the national service program designed to fight poverty and build economic opportunity. VISTA engages individuals 18 years and older in a year of

fulltime service in our nation's poorest urban and rural areas, working to build the organizational, administrative and financial capacity of programs that help pull and keep Americans out of poverty. VISTA members are assigned to community organizations (e.g. non-profit, faith-based) and public agencies to help the organizations build on locally-driven solutions to both the causes of poverty as well as the problems that arise in poverty-stricken communities. Rather than providing cash grants, the VISTA program, usually, places individual VISTA members with sponsoring organizations.

The Corporation created the VMSU, in October 2007, to relieve CSO staff of the burden of VISTA administrative support and to allow them to focus on identifying new VISTA projects and managing existing projects. A seven-person task force sought to identify a better way to provide VISTA administrative support. It determined that centralized lifecycle support and additional automated (electronic) processes would improve VISTA support. The intent is for the VMSU to provide consistency in processing and providing information, prevent duplicative effort and overhead costs, and control the quality of customer service. The VMSU handles administrative functions and activities such as:

- Arranging travel for members to attend pre-service orientation;
- Processing members into eSPAN for payroll related actions;
- Answering member's questions during the year of service;
- Assisting members with In-Service Training (IST) as needed; and
- Processing early terminations, requests for extensions and re-enrollments, or close of service of members.

#### **EXIT CONFERENCE**

We conducted an exit conference with Corporation representatives on April 13, 2010. The Corporation's response to the draft report was summarized after each recommendation and included, in its entirety, as Appendix A of this report.



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Stuart Axenfeld, Assistant Inspector General for Audit  
Office of Inspector General  
Corporation for National and Community Service

## **APPENDIX A**

### **Corporation's Response to Draft Report**

Corporation for  
**NATIONAL &  
COMMUNITY  
SERVICE** 

To: Stuart Axenfield, Assistant Inspector General for Audit

From: Mike Berning, Field Liaison Director 

Cc: Paul Davis, Acting Director for VISTA  
Jerry Thompson, Director, VISTA Member Support Unit  
Kristin McSwain, Chief of Program Operations  
James Siegal, Chief of Staff  
Patrick Corvington, Chief Executive Officer  
William Anderson, Chief Financial Officer  
Andrea Grill, Associate General Counsel, Office of General Counsel  
Rocco Gaudio, Deputy Chief Financial Officer  
Bridgette Roy, Audit Resolution Tracking Coordinator

Date: June 1, 2010

Subj: **Response to OIG Draft Report on the Audit of VISTA Member Support Unit (VMSU)**

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Thank you for the opportunity to comment on the OIG's audit of the VISTA Member Support Unit (VMSU) which is located in Austin, Texas. This response is the Corporation's draft management decision. As you know, we established the VMSU in 2007 and continue to make operational improvements as well as incorporate new features of the *My AmeriCorps* portal as they become available. The OIG's draft report has been helpful to the VISTA program and to VMSU staff in this process.

The Corporation is pleased that, while there are some compliance issues noted in your review of the VMSU, they are largely related to recordkeeping. None of the issues poses the risk of financial harm to a VISTA member. Members are properly paid living allowances, education awards, and stipends with supporting evidence.

**Finding 1. The VMSU lacked approved written operating policies and procedures.**

**Recommendations:** We recommend that the Corporation:

- 1a. Establish VISTA regulations that implement applicable public law; and

- 1b. Approve written operating policies and procedures for the VMSU.

**Management Decision:** The Corporation agrees with the recommendations and is in the process of revising its regulations, which are currently located at 45 CFR, Chapter XII. Specific VMSU procedures and policies, however, will be implemented through internal policy and guidance rather than public regulations. On January 15, 2010, I signed off on the VMSU's written operating policies and procedures.

**Finding 2. Member files were missing one or more documents and documentation in member files lacked required signatures. \*\*\***

**Recommendations:** We recommend that the Corporation require:

- 2a. The VMSU, in its approved written policies and procedures, to request missing, incomplete or unsigned documents from CSOs or VISTA sponsors; and document and track the request and receipt of missing, incomplete or unsigned documents;
- 2b. The VMSU, in its approved written policies and procedures, to notify the Directors of VISTA and OFL, of instances in which CSOs and VISTA sponsors are overdue in responding to requests for missing or incomplete documents; and
- 2c. CSOs and VISTA sponsors return requested documents, complete and signed, to the VMSU in a timely manner.

\*\*\* The four member files missing the W-4 (#'s 20, 26, 38, and 39 on Appendix B) were enrolled in projects supported with a program grant that authorized the sponsors to pay the subsistence allowances directly to the members; therefore, there is no W-4 entry into the CNCS/VISTA payroll database for these members and no need to have these forms on file.

**Management Decision:** The Corporation agrees with recommendation 2a. The current practice is that emails sent to VISTA members and Corporation state office staff requesting missing documents are filed in the member's file. When the missing document is received, it is placed in the member's file.

The Corporation agrees with recommendations 2b and 2c. On May 19, 2010 we sent a memo to Corporation state offices requiring that they comply with VMSU director requests for missing documents (see attached).

**Finding 3. Member serving without Oath of Service in the current member file.**

**Recommendation:** We recommend the Corporation, for VISTA members serving multiple terms, retain a copy of the Oath of Service for the prior term or a new Oath of Service in the members' current file.

**Management Decision:** The vast majority of VISTA members who serve multiple terms serve consecutive terms; therefore, the VISTA Member Registration Form (your referenced "Oath of Service" form) would be in the file. In the one example cited, the member was reinstated after a break in service and the member's file had been archived. In the future, for alumni with more than a 12-month break in service, a newly executed VISTA Member Registration Form will be required.

**Finding 4. Documentation used to establish citizenship or permanent resident alien status was missing or insufficient.**

**Recommendations:**

4a. Establish specific guidance and regulation, in coordination with finding 1a, regarding the documents CSOs and sponsors use to verify VISTA applicants' U.S. citizenship, national, or legal permanent resident alien status for the VISTA program that are similar to the requirements in 45 C.F.R. §2522.200; and

4b. Follow the requirements in 45 C.F.R. §2522.200 until specific guidance and rationale or justification has been established regarding primary and secondary documents that verify U.S. citizenship, national, or legal permanent resident alien status has been established for the VISTA program.

**Management Decision:** The VMSU is currently following the citizenship verification policies of VISTA. VISTA is working with the Office of General Counsel to ascertain if the documentation recommended by the Office of Inspector General – i.e., similar to that required for AmeriCorps\*State and National members under 45 C.F.R. §2522.200 -- is appropriate for use by VISTA.

Attachment

**MEMORANDUM**

**To:** State Program Directors

**CC:** Paul Davis, Acting Director, VISTA  
Jerry Thompson, Director, VISTA Member Support Unit

**Date:** May 19, 2010

**From:** Mike Berning, Director, Office of Field Liaison

**Subject:** Collecting VISTA Member Documents

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We need your help to ensure that the VISTA Member Support Unit (VMSU) has all required documents in VISTA member files. The VMSU is the official repository for member files and is responsible for file completeness.

To this end, the VMSU Director has the authority to collect member documents from state offices when such documents are missing from member files. When VMSU staff seek your support to obtain missing documentation, it is imperative that you work with members and project sponsors to collect the missing items and provide them to the VMSU in a timely manner.

## APPENDIX B

SAMPLED FILES WITH MISSING DOCUMENTS								
Member Identifier	Project Code	Electronic Documents			Hard Copy Documents			
		W-4	Life Ins	Legal Residency	Oath	TCB	Designation of Beneficiary (SF 1152)	Future Plans or Early Termination Request (V-732)
3	07VSWOK008							✓
9	10VSAVT001						✓	
11	06VSWTX030					✓		
19	09RVWNM004							✓
20	06VSANH001	✓	✓					✓
22	08VSWMO006						✓	
26	09RVPWA010	✓	✓					
32	07VSNMN006		✓					
33	07VSNMN006			✓				
36	06VSSVA006			✓				
37	06VSNMN019					✓	✓	✓
38	07VSWAZ010	✓				✓		
39	06VSWNM005	✓				✓		
40	06VSWAR009			✓	✓			

## APPENDIX C

<b>SAMPLED FILES WITH DOCUMENTS LACKING SIGNATURES</b>				
Member Identifier	Project Code	Designation of Beneficiary (SF 1152)	Future Plans or Early Termination Request (V-732)	Relocation Travel (V-81)
1	06VSSVA008	✓		
4	06VSNIA002	✓		
5	07VSNMI016		✓	
6	09VSWKS003	✓		
8	09VSWTX008	✓		
9	10VSAVT001		✓	
11	06VSWTX030	✓		
12	07VSNIN006	✓		
15	06VSNMN013	✓		
17	09VSNOH004	✓		
18	08VSSFL004	✓		
19	09RVWNM004	✓		
20	06VSANH001	✓		
21	06VSPWA014		✓	
23	07VSPWA007	✓		✓
25	06VSNMN019	✓		
26	09RVPWA010	✓		
27	08VSPWA007	✓		
28	09VSWTX020	✓	✓	
30	06VSWTX007	✓		
31	07VSSFL019	✓		
33	07VSNMN006	✓		
36	06VSSVA006	✓		
39	06VSWNM005	✓		

## APPENDIX D

<b>SAMPLED FILES WITH INSUFFICIENT OR MISSING PROOF OF LEGAL RESIDENCY</b>											
Member Identifier	Project Code	Proof of Legal Residency		Member Identifier	Project Code	Proof of Legal Residency		Member Identifier	Project Code	Proof of Legal Residency	
		Insufficient	Missing			Insufficient	Missing			Insufficient	Missing
1	06VSSVA008	✓		17	09VSNOH004	✓		29	07VSWLA004	✓	
2	07VSARI009	✓		18	08VSSFL004	✓		30	06VSWTX007	✓	
3	07VSWOK008	✓		19	09RVWNM004	✓		31	07VSSFL019	✓	
5	07VSNMI016	✓		20	06VSANH001	✓		32	07VSNMN006	✓	
6	09VSWKS003	✓		21	06VSPWA014	✓		34	09VSSVA003	✓	
7	06VSANY016	✓		22	08VSWMO006	✓		37	06VSNMN019	✓	
9	10SAVT001	✓		24	06VSNIL006	✓		38	07VSWAZ010	✓	
11	06VSWTX030	✓		25	06VSNMN019	✓		33	07VSNMN006		✓
13	08VSPCA006	✓		27	08VSPWA007	✓		36	06VSSVA006		✓
14	08VSSTN007	✓		28	09VSWTX020	✓		40	06VSWAR009		✓

The shaded cells in the table above indicate instances where end of service education award was selected by members whose verification of legal residency was either insufficient or missing.