

Office of Inspector General Corporation for National and Community Service

AGREED-UPON PROCEDURES REVIEW
OF EDUCATION AWARD PROGRAM GRANTS
TO
WESTERN WASHINGTON UNIVERSITY –
WASHINGTON CAMPUS COMPACT

OIG REPORT 09-08



Corporation for
**NATIONAL &
COMMUNITY
SERVICE** 

Prepared by:

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This report was issued to Corporation management on March 31, 2009. 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 September 30, 2009, and complete its corrective actions by March 31, 2010. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.



OFFICE OF INSPECTOR GENERAL

March 31, 2009

TO: Lois Nembhard
Acting Director, AmeriCorps*State and National

Margaret Rosenberry
Director, Office of Grants Management

FROM: Stuart Axenfeld /s/
Assistant Inspector General for Audit

SUBJECT: OIG Report 09-08, *Agreed-Upon Procedures Review of Corporation for National and Community Service Education Award Program Grants to Western Washington University – Washington Campus Compact*

Attached is the final report for the above-noted agreed-upon procedures review. We contracted with the independent certified public accounting firm of Regis & Associates, PC (Regis) to perform the procedures. The contract required Regis to conduct its review in accordance with generally accepted government auditing standards.

Regis is responsible for the attached report, dated November 26, 2008, and the conclusions expressed therein. We do not express opinions on the Schedule of Questioned Education Awards and Administrative Fees, conclusions on the effectiveness of internal controls, or the grantee's compliance with laws, regulations, and grant provisions.

Under the Corporation's audit resolution policy, a final management decision on the findings in this report is due by September 30, 2009. Notice of final action is due by March 31, 2010.

If you have questions pertaining to this report, please call me at (202) 606-9360, or Ron Huritz at (202) 606-9355.

Attachment

cc: Jennifer Dorr, Executive Director, Washington Campus Compact
William Anderson, Acting Chief Financial Officer, CNCS
Rocco Gaudio, Deputy Chief Financial Officer, Grants & Field Financial Management, CNCS
Sherry Blue, Audit Resolution Coordinator, CNCS
Peter Regis, President, Regis & Associates, PC



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**OFFICE OF INSPECTOR GENERAL
CORPORATION FOR NATIONAL AND COMMUNITY SERVICE**

**AGREED-UPON PROCEDURES REVIEW OF
CORPORATION FOR NATIONAL AND COMMUNITY SERVICE
EDUCATION AWARD PROGRAM GRANTS TO
WESTERN WASHINGTON UNIVERSITY - WASHINGTON CAMPUS COMPACT**

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EXECUTIVE SUMMARY

The Office of Inspector General (OIG), Corporation for National and Community Service (Corporation), contracted with Regis & Associates, PC to perform an agreed-upon procedures (AUP) review of Western Washington University – Washington Campus Compact (WWU), solely to assist the OIG in compliance testing of member files for AmeriCorps Education Award Program (EAP) grants nos. 04EDHWA001 and 07EDHWA001 to WWU for Program Years (PYs) 2006-2007 and 2007-2008.

As a result of applying these procedures, we have questioned amounts totaling \$19,716 consisting of education awards of \$6,976, and administrative fees of \$12,740. The questioned administrative fees include \$1,200 for ineligible members and \$11,540 for draw down of excess grant funds. The detailed results of our AUP and questioned education awards and administrative fees are presented in the *Independent Accountant’s Report on Applying Agreed-Upon Procedures (see Page 3)*.

A questioned amount is an alleged violation of a provision of law, regulation, contract, grant, cooperative agreement, or other agreement or document governing the expenditure of funds; or a finding that, at the time of testing, such amounts were not supported by adequate documentation.

Questioned Amounts. As a result of testing a sample of transactions, we questioned the following:

<u>Grant Number</u>	<u>Grant Period</u>	<u>Questioned Amounts</u>	
		<u>Education Awards</u>	<u>Administrative Fees</u>
04EDHWA001	08/01/2006 - 07/31/2007	\$ 6,976	\$ 12,320
07EDHWA001	08/01/2007 - 07/31/2008	-	\$ 420
Total		\$ 6,976	\$ 12,740

Compliance Testing Results. The results of our agreed-upon procedures showed instances of non-compliance with grant provisions, regulations, or Office of Management and Budget (OMB) Circulars. Those instances of non-compliance are shown in Exhibit B in the Compliance Testing Results section of the *Independent Accountants’ Report on Applying Agreed-Upon Procedures*.

Exit Conference and Responses to Draft Report. The contents of this report were discussed with WWU and the Corporation at an exit conference held at the Corporation’s Headquarters in Washington DC, on January 9, 2009. We provided a draft of this report to WWU and to the Corporation on February 6, 2009 for comment. WWU’s response to the findings and recommendations in the draft report are included as Appendix A and

summarized in each finding. The Corporation did not respond to the individual findings and recommendations. Its response is included as Appendix B.

Agreed-Upon Procedures Scope

This AUP review had the objectives of determining whether members enrolled in the program were eligible to serve, performed their service in accordance with grant terms and conditions and, if certified for an education award, performed the minimum service hours required. The grant award periods are August 1, 2004, to July 31, 2007, for Grant No. 04EDHWA001; and August 1, 2007, to July 31, 2010, for Grant No. 07EDHWA001. The period of our testing was August 1, 2006, to September 30, 2008. We tested 14 member files as part of the engagement planning phase and 414 member files during the testing phase from a total population of 4,117 member files. We performed our procedures during the period September 12 through November 26, 2008.

The OIG's AUP program, dated September 2008, provided guidelines for reviewing WWU's operations and testing its compliance with provisions of the EAP grant. We used sampling software to randomly select the sample for our testing; however, we did not project the results of the sample to the total population of member files. These procedures are described in more detail in the *Independent Accountants' Report on Applying Agreed-Upon Procedures*.

Background

The Corporation supports national and community service programs that provide full-time and part-time opportunities for Americans to engage in service that fosters civic responsibility, strengthens communities, and provides educational opportunities for those who make a commitment to service. The AmeriCorps program is one of the Corporation's three major service initiatives. Approximately three-quarters of all AmeriCorps grant funding goes to governor-appointed State service commissions, which award competitive grants to nonprofit groups that recruit AmeriCorps members. The Corporation distributes most of the balance of its funding directly to multi-State and national organizations, such as WWU, through a competitive grant process.

WWU administers a part-time AmeriCorps program called Students in Service (SIS), which encourages and supports college students to enroll as part-time AmeriCorps members, who provide human services in their communities. The purposes of the SIS program are to meet critical community needs by engaging higher education students in service as part-time AmeriCorps members, and fostering within them an ethic of civic responsibility. Student members serve in partnership with schools and community-based organizations in the areas of education, environment, public safety, and community development.

The SIS program is offered in the states of California, Hawaii, Idaho, Montana, Oregon and Washington. SIS members gain valuable civic and workforce skills, and upon completion of their term of service, members earn an education award.

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

Regis & Associates, PC performed the procedures that were agreed to by the OIG, solely to assist it in compliance testing of member files for Education Award Program (EAP) Grant Nos. 04EDHWA001 and 07EDHWA001 to Western Washington University – Washington Campus Compact (WWU) for program years 2006-2007 and 2007-2008. This AUP engagement was performed in accordance with standards established by the American Institute of Certified Public Accountants and generally accepted government auditing standards. The sufficiency of these procedures is solely the responsibility of the OIG. Consequently, we make no representation regarding the sufficiency of the procedures described below, either for the purpose for which this report has been requested or any other purpose.

We were not engaged to, and did not perform an examination, the objective of which would be the expression of an opinion on WWU management's assertions. Accordingly, we do not express such an opinion. Had we performed other procedures, other matters might have come to our attention that would have been reported to you.

We performed the following procedures to verify that:

- Hours recorded on members' timesheets supported their eligibility to earn education awards;
- Timesheets, forms, and contracts were in members' files and were signed, dated, and did not contain discrepancies;
- Service hours reported in the Corporation's Web-Based Reporting System (WBRs) agreed with hours recorded on timesheets;
- Members were U.S. citizens, nationals, or lawful permanent residents and had obtained high-school diplomas or equivalency certificates;
- Criminal background checks were conducted for members who had substantial recurring contact with children or other vulnerable individuals;
- Contracts were signed by members and included required AmeriCorps stipulations;
- End-of-term member performance evaluations were performed and documented;

- Members who received a prorated education award were released for compelling personal circumstances;
- Enrollment, exit, and change-of status-forms were completed and approved in WBRS within 30 days of members starting and ending service or changing their status;
- Members attended pre-service orientation sessions;
- WWU certified to the National Service Trust that members were eligible to receive education awards;
- No more than 20 percent of the aggregate of all AmeriCorps members' service hours was spent in training and educational activities; and
- Members did not exceed the fundraising limitation of 10 percent.

Results

As a result of applying the agreed-upon procedures, we questioned education awards of \$6,976 for two members with insufficient hours and two missing member files, and administrative fees of \$12,740. The questioned administrative fees included \$1,200 for seven ineligible members, and \$11,540 in excess drawdowns of grant funds. The questioned amounts are summarized in Exhibit A, *Schedule of Questioned Education Awards and Administrative Fees*. The compliance testing results are summarized in Exhibit B, *Compliance Testing Results*. Issues identified include the following:

1. Some timesheets did not include documentation to support eligibility to earn education awards and had date and signature discrepancies.
2. Documentation in member files did not support eligibility.
3. Two member files and related documentation were not retained by WWU.
4. WWU drew down excess grant funds for PY 2006-2007.
5. WWU did not have documentation to support that criminal background checks were conducted as part of its member screening process.
6. Members recorded service hours before contracts were signed.
7. WWU did not have documentation that end-of-term member performance evaluations were performed.

8. WWU did not complete some member enrollment, exit, and change-of-status forms and enter them into WBRS in a timely manner.
9. WWU did not retain documentation of member attendance at pre-service orientation sessions.

EXHIBIT A

**WESTERN WASHINGTON UNIVERSITY – WASHINGTON CAMPUS COMPACT
EDUCATION AWARD PROGRAM
SCHEDULE OF QUESTIONED EDUCATION AWARDS
AND ADMINISTRATIVE FEES**

Reasons for Questioned <u>Amounts</u>	Enroll- ment <u>Type</u>	Number of <u>Members</u>	Education <u>Award</u>	Admin <u>Fees</u>	Total Questioned <u>Amounts</u>
No Evidence of US Citizenship					
Program Year 2006 – 2007	MT	1	-	\$ 80	\$ 80
Program Year 2006 – 2007	QT	1	-	\$ 100	\$ 100
Program Year 2007- 2008	MT	1	-	\$ 120	\$ 120
No High School Diploma					
Program Year 2006 – 2007	HT	1	-	\$ 200	\$ 200
No Background Check					
Program Year 2007-2008	2YHT	1	-	\$ 300	\$ 300
Missing Member Files					
Program Year 2006 – 2007	HT	2	\$ 4,726	\$ 400	\$ 5,126
Hours in WBRS not Supported by Timesheets					
Program Year 2006 – 2007	QT	1	\$ 1,250	-	\$ 1,250
Program Year 2006 – 2007	MT	1	\$ 1,000	-	\$ 1,000
Excess draw downs					
Program Year 2006 – 2007				\$ 11,540	\$ 11,540
Total Questioned Education Awards and Administrative Fees			\$ 6,976	\$ 12,740	\$ 19,716

(QT – Quarter Time; MT – Minimum Time; HT – Half Time; 2YHT – Two-year Half-Time)

EXCESS DRAWDOWNS

<u>Program Year</u>	<u>Number of FTEs</u>	<u>Administrative Fee Entitlement</u>	<u>Drawdown Amount</u>	<u>Excess Drawdown</u>
2006-2007	596	\$ 227, 200	\$ 238, 740	\$ 11,540

**WESTERN WASHINGTON UNIVERSITY
WASHINGTON CAMPUS COMPACT**

EDUCATION AWARD PROGRAM

COMPLIANCE TESTING RESULTS

Finding 1. Some timesheets did not include documentation to support eligibility, service hours were not accurately recorded in WBRS, and timesheets had date and signature discrepancies.

Service hours recorded in WBRS for 123 of the 428 members tested did not agree with hours reported on the members’ timesheets. These differences did not affect the members’ eligibility to earn education awards for 121 of the 123 members, as those members’ service hours exceeded Corporation requirements. However, the differences did affect two members’ eligibility to earn education awards. We questioned the education awards for the two members in the amount of \$2,250. The table below indicates the status of hours for the two members whose timesheets did not support eligibility:

Program Year	Enrollment Type/Status	Hours in WBRS	Hours on Timesheets	Difference
2006-2007	QT/Complete-Full Award	463.50	0.00	(463.50)
2006-2007	MT/Complete-Full Award	303.50	290.00	(13.50)

In addition, we determined that timesheets had the following discrepancies:

- Lack of member and/or supervisor signature.
- Untimely dates, or were all signed on the same date.
- Changes made to timesheets were not initialed as corrected.

WWU attributed the differences between the hours listed on the timesheets and the hours recorded in WBRS to its monthly time reporting system. Although WWU requires that timesheets be completed and submitted within 30 days after the end of the month of service, timesheets are sometimes submitted late, and for several months at a time. Program officials did not always thoroughly review the timesheets and other forms used to ascertain completeness of hours recorded by the members, and also did not ensure that site supervisors signed and dated the timesheets.

WWU did not comply with its procedures to verify members’ activities or timesheet accuracy. Therefore, the potential exists that members may perform prohibited activities or members may not perform and accumulate enough service hours to earn education awards.

Criteria

The 2006/2007 AmeriCorps Education Award Grant Provision Section IV.F.1. *Terms of Service, Program Requirements*, states that to be eligible for an education award:

Each Program must, at the start of the term of service, establish the guidelines and definitions for the successful completion of the program year, ensuring that these program requirements meet the Corporation's service hour requirements as defined below:

- a. Full-Time Members.** Members must serve at least 1700 hours during a period of not less than nine months and not more than one year.
- b. Half-Time Members.** Half-time members must serve at least 900 hours during a period of one or two years as indicated in the approved budget.
- c. Reduced Half-Time Members.** Reduced half-time members must serve at least 675 hours over a time not to exceed one year.
- d. Quarter-Time Members.** Quarter-time members must serve at least 450 hours over a time not to exceed one year.
- e. Minimum Time Members.** Minimum time members must serve at least 300 hours over a time not to exceed one year.

Recommendations

We recommend that the Corporation:

- 1a. Disallow and recover \$2,250 in education awards for members determined to be ineligible.
- 1b. Require WWU to comply with its procedures to ensure the review and approval of hours recorded on timesheets, ensure that timesheets are signed by the member and supervisor, that changes to timesheets are initialed by the member and supervisor, and that documentation exists to support the review.

WWU's Response

WWU indicated that, subsequent to our review, it redesigned the members' time log to include directions for completing the log. It has also instructed its campus partners not to accept time logs that are not signed and dated by the member and the site supervisor within 30 days of their due date.

WWU encourages its members to use time logs in various electronic formats, including writeable PDF and Excel spreadsheet formats.

Auditor's Comments

The actions proposed by WWU appear to be adequate in addressing the finding. However, the Corporation should follow up to ensure that the planned actions are implemented.

Finding 2. Documentation in member files did not support eligibility.

Files for three members did not include documentation to support evidence of citizenship or lawful permanent residency. These three members exited the program without receiving an education award. We noted that the file for one of the three members contained a copy of a birth certificate from a foreign nation, and there was no other documentation provided to support U.S. residency status. Additionally, the self-certification statement for a high school diploma or its equivalent was not signed by one member. This member also exited without receiving an education award.

We questioned \$300 in administrative fees paid to WWU for the three members with inadequate citizenship documentation, and \$200 for the one member with inadequate documentation for the high school diploma requirement.

The program staff did not obtain documentation to ensure the members met the citizenship or residency eligibility requirements. Additionally, the program staff did not ensure that a copy of one high school diploma was provided, or that the self-certification statement for a high school diploma or its equivalent was signed by the member.

Programs that do not maintain documentation to ensure that applicants meet the citizenship or residency and high school diploma eligibility requirements are at risk of enrolling members who may not be eligible to participate in AmeriCorps programs.

Criteria

The 2006/2007 AmeriCorps Education Award Grant Provisions Section IV.M.2. *Member Records and Confidentiality*, states in part,

Verification. To verify U.S. citizenship, U.S. national status or, U.S. lawful permanent resident alien status, the grantee must obtain and maintain documentation as required by 45 C.F.R. §2522.200(b) and (c). The Corporation does not require programs to make and retain copies of the actual documents used to confirm age or citizenship eligibility requirements, such as a driver's license, or birth certificate, as long as the grantee has a consistent practice of identifying the documents that were reviewed and maintaining a record of the review.

According to 45 C.F.R. § 2522.200, *What are the eligibility requirements for an AmeriCorps participant? Every AmeriCorps participant is required to be a citizen, national, or lawful permanent resident alien of the United States.*

Recommendations

We recommend that the Corporation:

- 2a. Recover \$500 in administrative fees for members determined to be ineligible.
- 2b. Require WWU to adhere to the grant provisions to ensure that adequate documentation is maintained to verify member eligibility.

WWU's Response

The grantee's policy is that all members must provide satisfactory identification during the enrollment process. However, it acknowledged that identification for the questioned members was either missing or reflected members' ineligibility for the program.

WWU instructed its campus partners to be more diligent in ensuring that members properly self-certify that they have earned high school diplomas, and that identification that satisfies program requirements be obtained.

Auditor's Comments

The actions proposed by WWU appear to be adequate in addressing the findings. However, the Corporation should follow up to ensure that the planned actions are implemented.

Finding 3. Two member files and related documentation were not retained by WWU.

Our review of 428 member files found that WWU did not retain any records for two half-time members. We were unable to review documentation to determine their eligibility to participate in the program or timesheets to support their earned education awards. The grantee's inability to demonstrate member eligibility, or to establish that required service hours were completed, resulted in two questioned education awards and related administrative fees.

We questioned \$5,126, which consists of \$4,726 in education awards, and \$400 in administrative fees paid to WWU for the two members who served in PY 2006-2007.

Programs that do not maintain documentation to ensure that applicants and members meet eligibility requirements, and that members accumulate the requisite service hours, are at risk of enrolling members who may not be eligible to participate in AmeriCorps programs or who may not have served enough hours to earn an education award.

Criteria

The 2006/2007 AmeriCorps Education Award Grant Provision Section V.D., *Retention of Records*, requires grantees to retain all program records for three years from the date of the

submission of the applicable final closeout documents. If an audit is started prior to the expiration of the three-year period, the records must be retained until the audit findings involving the records have been resolved and final action has been taken.

Recommendations

We recommend that the Corporation:

- 3a. Disallow and recover from WWU questioned education awards and administrative fees totaling \$5,126 for the two members referenced in the finding.
- 3b. Ensure that WWU maintains the required member information in its files for the retention period specified by the grant provisions.

WWU's Response

WWU acknowledged that it was unable to locate the two missing PY 2006-2007 files. During that year, the grantee's program was transitioning from a centralized program to a decentralized program, and staff changes at the campus location where the two members were serving may have contributed to the inability to locate the files.

WWU has implemented new policies and procedures that require the campus partners to account for all their member files at the end of each grant year. In addition, internal file audits will be conducted during WWU's yearly site visits to the campuses.

Auditor's Comments

The actions proposed by WWU, if implemented, should be adequate to address the finding.

Finding 4. WWU drew down excess grant funds for PY 2006-2007.

Our analysis of grantee drawdowns indicated that \$11,540 was overdrawn for Grant No. 04EDHWA001 in PY 2006-2007. This amount is included in the schedule of questioned costs (Exhibit A).

The Notice of Grant Award amendment for PY 2006-2007 allowed the grantee to draw down a maximum of \$227,200. However, the grantee drew down approximately \$238,740.

WWU makes draw downs against the education award program grants based on actual administrative costs incurred and amounts sub-awarded to other Campus Compacts. The grantee also tracks its grant activity on a grant cycle basis. The grant in question covered the period August 1, 2004, to July 31, 2007. The funds awarded over the three-year cycle exceeded the amount drawn over the same period because the annual allotment of member service year (MSY) slots was not filled in some years. The grantee believed that, since the

number of total authorized slots was not exceeded, refilled slots would be allowed by the Corporation.

For PY 2006-2007, the grant allocated 568 MSY slots, but the grantee drew down the equivalent of 596 occupied slots, which included slot refills. As a result, the grantee drew down \$11,540 in grant funds to which it was not entitled.

Criteria

The 2006/2007 AmeriCorps Education Award Program Grant Provisions Section V.K, *General Provisions, Responsibilities Under Grant Administration, Fixed Amount Award* states:

Education Award Programs are for fixed amounts and are not subject to the Federal Cost Principles. The fixed amount is based on the approved number of members and is funded at the amount per full-time equivalent member specified in the award.

The award is dependent upon the grantee's performance under the terms and conditions of the award. These include properly enrolling the number of members as specified in the award to carry out the activities and to achieve the specific project objectives as approved by the Corporation. Failure to enroll the number of members approved in the grant itself may result in the reduction of the amount of the grant.

Recommendations

We recommend that the Corporation:

- 4a. Recover \$11,540 in excess grant funds drawn down for PY 2006-2007;
- 4b. Require WWU to adhere to the grant provisions to ensure that grant funds are not overdrawn.

WWU's Response

WWU agreed with the finding and will work with the Corporation's Resolution Coordinator to address this matter.

Auditor's Comments

The grantee's response is adequate to address the finding.

Finding 5. WWU did not have documentation to support that criminal background checks were conducted as part of its member screening process.

WWU could not provide documentation to support that criminal background checks were completed as part of its screening process for 61 members. Program files for 59 members in PY 2006-2007, and two members in PY 2007-2008, did not have evidence that background checks had been conducted.

Effective November 23, 2007, Corporation requirements were changed to state that members for whom criminal background checks had not been conducted were deemed ineligible to serve in the EAP Program. Therefore, we questioned administrative fees in the amount of \$300 for one member in PY 2007- 2008 who was enrolled in July 2008. Program staff did not ensure that the required background checks were conducted for these members.

Without documentation of required criminal background checks, members who should not have been working with children or other vulnerable persons may have had substantial direct contact with those groups, resulting in a potential liability for WWU and the Corporation and posing a potential danger to the persons being served.

Criteria

The 2006/2007 AmeriCorps Education Award Program Grant Provisions Section IV.C. *Member Enrollment*, states:

Criminal Background Checks. Programs with members (18 and over) or grant-funded employees who, on a recurring basis, have access to children (usually defined under state or local law as un-emancipated minors under the age of 18) or to individuals considered vulnerable by the program (i.e. the elderly or individuals who are either physically or mentally disabled), shall, to the extent permitted by state and local law, conduct criminal background checks on these members or employees as part of the overall screening process.

The grantee must ensure, to the extent permitted by state or local law, that it maintains background check documentation for members and employees covered by this provision in the member or employee's file or other appropriate file. The documentation must demonstrate that, in selecting or placing an individual, the grantee or the grantee's designee (such as a site sponsor) reviewed and considered the background check's results.

Recommendations

We recommend that the Corporation:

- 5a. Recover administrative fees of \$300 for the member enrolled after November 23, 2007, whose criminal background check was not conducted.

- 5b. Require WWU to strengthen its controls and procedures for obtaining and retaining documentation supporting criminal background checks as permitted by State law, and demonstrate that the results were considered as part of its member screening process.

WWU's Response

The Student-in-Service program significantly improved its performance in conducting and documenting criminal background checks. WWU acknowledged that background checks for the two PY 2007-2008 members noted in this report were performed more than a year prior to their enrollment. WWU plans to have the background checks re-done for these members. The grantee plans to be more diligent in conducting and documenting timely background checks in compliance with the Corporation's policies.

Auditor's Comments

WWU's comments are responsive to the intent of the finding.

Finding 6. Members recorded service hours before contracts were signed.

We found that 228 members recorded service hours before they had signed member contracts. We did not question the members' education awards because they performed sufficient hours after the contracts were signed to make them eligible for awards. WWU's management stated that its understanding of the provisions regarding the contracts was unclear.

Individuals who record service time before contracts are in place may receive benefits, including education and accrued interest awards, to which they are not entitled.

Criteria

The 2006/2007 AmeriCorps Education Award Grant Provisions Section IV.C. *AmeriCorps Special Provisions, Member Enrollment*, states in part:

1. *Member Enrollment Procedures.*

- a. An individual is enrolled as an AmeriCorps member when all of the following have occurred:
 - i. He or she has signed a member contract;
 - ii. The program has verified the individual's eligibility to serve;
 - iii. The individual has begun a term of service; and
 - iv. The program has approved the member enrollment form in WBRS.
- b. Prior to enrolling a member in AmeriCorps, programs make commitments to individuals to serve. A commitment is defined as

signing a member contract with an individual or otherwise entering into a legally enforceable commitment as determined by state law.

Recommendation

6. We recommend that the Corporation require WWU to ensure that members sign contracts before performing and recording service hours.

WWU's Response

WWU agreed with the finding and stated its understanding that the member contract could be signed within 30 days of the official enrollment date. The grantee has revised its enrollment checklist and notified its campus partners that a member's term of service does not start until all enrollment paperwork is signed and satisfactory identification is provided.

Auditor's Comments

The actions proposed and implemented by WWU are adequate in addressing the finding. However, the Corporation should follow up to ensure that planned actions are implemented.

Finding 7. WWU did not have documentation that end-of-term member performance evaluations were performed.

We found that end-of-term evaluation forms were not completed for 94 members (80 members in PY 2006-2007; and 14 members in PY 2007-2008).

WWU's management stated that its understanding of the provisions relating to end-of-term evaluations was unclear.

Without final evaluations, WWU or its program sites may not be able to determine whether a member satisfactorily completed his or her term of service, is eligible for an education award, or is eligible to serve a second term. Properly completed evaluations are necessary to ensure that members are eligible to serve additional terms and that grant objectives have been met.

Criteria

Title 45 C.F.R. § 2522.220(d) *Participant performance review*, states that:

For the purposes of determining a participant's eligibility for a second or additional term of service and/or for an AmeriCorps education award, each AmeriCorps program will evaluate the performance of a participant mid-term and upon completion of a participant's term of service. The end-of-term performance evaluation will assess the following: (1) Whether the participant has completed the required number of hours described in paragraph (a) of this section.

The Students in Service website, *Expectations of a Site Supervisor*, states:

“To sign the member's site agreement, monthly time logs, complete mid-term evaluation (for 900 hr. term members only) and end-of term evaluation, and to monitor member's compliance regarding prohibited activities.”

Recommendation

7. We recommend that the Corporation ensure that WWU adheres to the grant provisions and its requirements regarding end-of-term evaluations.

WWU's Response

WWU agreed with the finding but is unclear about the end-of-term member evaluation requirement. The grantee requires its site supervisors to complete an online supervisory end-of-term evaluation for all members.

WWU has simplified the end-of-term supervisory evaluation and created a one-page hard copy evaluation form that campus partners can review to determine whether the member's service was satisfactory.

Auditor's Comments

The grantee's actions are responsive to the finding.

Finding 8. WWU did not complete some member enrollment, exit, and change-of-status forms and enter them into WBRS in a timely manner.

We found that WWU did not have adequate documentation to demonstrate whether enrollment and exit forms were properly completed and submitted in a timely manner for 97 members. These 97 members had 105 forms that were entered late. Specifically, we noted that:

- 40 enrollment forms were not entered into WBRS within 30 days of member start dates.
- 54 exit forms were not entered in WBRS within 30 days of members completing their service.
- 5 enrollment and exit forms lacked member and/or supervisor signatures or were undated.
- 3 change-of-status forms were not entered into WBRS within 30 days of the status change.

- Files for three members were missing either the entire enrollment and exit forms or pages of the forms, and did not contain the page requiring program directors to certify to the National Service Trust that members were eligible for education awards.

According to WWU management, the majority of these instances were clerical oversights.

Without accurate and timely submission of these forms, the Corporation cannot maintain timely and complete member records, and WWU may not be able to properly review, track, and monitor program site activities and accomplishments.

Criteria

The 2006/2007 AmeriCorps Education Award Grant Provisions Section IV.O.3. *AmeriCorps Special Provisions, Reporting Requirements*, states in part:

AmeriCorps Member-Related Forms. The grantee is required to submit the following documents to the National Service Trust at the Corporation on forms provided by the Corporation. Grantees and sub-grantees may use WBRS to submit these forms electronically. Programs using WBRS must also maintain hard copies of the forms.

a. *Enrollment Forms.* Enrollment forms must be submitted no later than 30 days after a member is enrolled.

b. *Change of Status Forms.* Member Change of Status Forms must be submitted no later than 30 days after a member's status is changed. By forwarding Member Change of Status Forms to the Corporation, State Commissions and Parent Organizations signal their approval of the change.

c. *Exit/End-of-Term-of-Service Forms.* Member Exit/End-of-Term-of-Service Forms must be submitted no later than 30 days after a member exits the program or finishes his/her term of service.

Recommendation

8. We recommend that the Corporation require WWU to enhance its controls and procedures to ensure that enrollment, exit, and change-of-status actions are reported to the Corporation in a timely manner, and that related forms are maintained in member files as required.

WWU's Response

WWU stated that over the past two years, the program has made significant strides in improving its performance for entering information in WBRS on enrollments, exits, and

change of status actions. WWU noted that for program years 2007-2008 and 2008-2009, the average time elapsing between enrollment and approval was eight days.

WWU trained its campus partners on the policies, and will continue to strengthen its policies, procedures, and controls with regard to the 30-day requirement. It will also be more diligent in notifying the Corporation of these actions on a timely basis.

Auditor's Comments

The actions proposed by WWU are responsive to the finding, However, the Corporation should follow up to ensure that planned actions are implemented.

Finding 9. WWU did not retain documentation of member attendance at pre-service orientation sessions.

WWU did not retain sign-in sheets or other documentation to support member attendance at AmeriCorps orientation sessions for 292 members.

According to WWU officials, the program sites do not always retain the sign-in sheets after the orientation sessions are conducted, but noted that all members are required to attend the orientation sessions.

Retention of orientation sign-in sheets is necessary to ensure that members understand all program requirements. A member who does not participate in the required orientation may not be aware of requirements to which he/she must adhere to successfully complete the EAP program.

Criteria

The 2006/2007 AmeriCorps Education Award Grant Provisions Section IV.E.3. *Training, Supervision, and Support*, states that:

The grantee must conduct an orientation for members and comply with any pre-service orientation or training required by the Corporation. This orientation should be designed to enhance member security and sensitivity to the community. Orientation should cover member rights and responsibilities, including the Program's code of conduct, prohibited activities (including those specified in the regulations), requirements under the Drug-Free Workplace Act (41 U.S.C. 701 *et seq.*), suspension and termination from service, grievance procedures, sexual harassment, other non-discrimination issues, and other topics as necessary.

Recommendation

9. We recommend that the Corporation require WWU to adhere to the grant provisions and ensure that it retains all documentation to support member attendance at pre-service orientation sessions.

WWU's Response

WWU stated its policy that all potential members are required to review an online pre-service orientation and complete a questionnaire. After completing the orientation, the potential member is required to schedule an in-person orientation before being enrolled. WWU was unclear that there was a requirement to maintain attendance records for the orientation sessions.

WWU has now trained its campus partners to keep attendance records on file, including the in-person orientation sign-in-sheets. Reminders are also posted at the start of the video and PowerPoint for orientation sessions.

Auditor's Comments

The grantee's actions are adequate to address this finding.

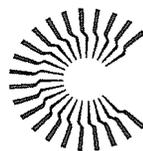
This report is intended for the information and use of the Office of Inspector General, Corporation management, WWU, and the U.S. Congress. However, this report is a matter of public record and its distribution is not limited.



Regis & Associates, PC
November 26, 2008

APPENDIX A

**WESTERN WASHINGTON UNIVERSITY –
WASHINGTON CAMPUS COMPACT
RESPONSE TO THE DRAFT REPORT**



Washington
Campus Compact

February 24, 2009

MEMBERS

Presidents or Chancellors of:

Antioch University Seattle*
Cascadia Community College
Central Washington University
Clark College
Eastern Washington University
Edmonds Community College
Everett Community College
Gonzaga University
Grays Harbor College
Heritage University
Lake Washington Technical College
Northwest Indian College*
Olympic College
Saint Martin's University
Seattle Central Community College
Seattle Pacific University
Seattle University*
Shoreline Community College*
Skagit Valley College
South Puget Sound Community College
Spokane Community College
Spokane Falls Community College*
Tacoma Community College
The Evergreen State College
University of Washington
University of Washington, Bothell
University of Washington, Tacoma
Walla Walla Community College
Washington State University*
Washington State University, Spokane
Washington State University, Vancouver
Western Washington University*
Whatcom Community College
Whitworth University*
* indicates president/chancellor is member of
Washington Campus Compact
Executive Board

EXECUTIVE STAFF

Jennifer H. Dorr, Executive Director

Stuart G. Axenfeld
Assistant Inspector General for Audit
Office of Inspector General
Corporation for National and Community Service
1201 New York Avenue, NW Ste. 830
Washington, DC 20525

Dear Mr. Axenfeld,

Thank you for the opportunity to comment on the draft report of the recent audit of Western Washington University—Washington Campus Compact's Students in Service Program. We found the audit to be very helpful in bringing to light program areas that need improvement. There were significantly fewer findings during the 2007-2008 grant year than there were in the 2006-2007 grant year because procedures were changed before the 2007-2008 grant year to be more compliant with CNCS policies. In areas that were pointed out from the findings that needed further strengthening, we have already taken steps to implement new policies and procedures that should significantly reduce or eliminate future findings in the areas detailed in the draft report.

Response to the findings of the OIG auditors:

Finding 1 – Some timesheets did not include documentation to support eligibility, and hours were not accurately recorded in WBRS and had date and signature discrepancies.

The Students in Service program has recently redesigned the member's time log to include directions for completing the time log actually on the time log. We have also instructed all of our campus partners to be more diligent in checking time logs before they are approved and to not to accept any time logs that are not signed and dated by the member and site supervisor on or before 30 days of the end of the completed time log month.

We are highly encouraging members to complete their time logs using the writable pdf time log format or Excel time log format to reduce the number of cross-outs on time logs as well as to simplify totaling the time log hours using the Excel spreadsheets provided. Going forward, we believe the new procedures will significantly reduce or eliminate future findings concerning time logs.

Finding 2. Documentation in member files did not support eligibility.

It is the Students in Service program policy that all members include a satisfactory identification with their enrollment paperwork that determines they are a United States citizen, United States national, or permanent legal resident before they are enrolled in the

program. Unfortunately, 3 of the 428 members audited were either missing a satisfactory identification or were an international student. We have instructed all of our campus partners to be more diligent in ensuring the member has a satisfactory identification before the member is enrolled into WBRS. And, we have clarified with our campus partners that no international students on student visas can take part in the Students in Service program.

As for the one member who did not complete the last question on the Enrollment Part 2 that self-certifies having a high school diploma, we have notified all campus partners to make sure they are more diligent in checking that they are enrolling members who have self-certified that they have at least a high school diploma.

Finding 3. Two member files and related documentation were not retained by WWU.

Unfortunately, at this time, we are missing the two files in question; however, we are confident the two members did enroll and complete their terms of service and that the files are complete. We will continue to try to locate the files on the campuses where the files are stored, and we will work with the CNCS Resolution Coordinator on this matter.

Both missing files are from the 2006-2007 grant year. During this period, the Students in Service program was transitioning from a centralized program to a decentralized program. While the transition was a success, significant staff changes at the two campuses where the files are missing may have contributed to the missing files. Going forward, we have new policies and procedures that include requiring campus partners, at the end of the grant year, to account for all of their grant-year files. Also, internal file audits will be conducted during the 1-2 campus visits per grant year. Having the new policies and procedures in place will lead to all files being accounted for and available for review at any time.

Finding 4. WWU drew down excess grant funds for PY 2006-2007.

We agree with the auditors' findings and explanation of how the excess draw-down occurred. We will work with the CNCS Resolution Coordinator on this matter.

Finding 5. WWU did not have documentation to support that criminal background checks were conducted as part of its member screening process.

From the 2006-2007 grant year to the 2007-2008 grant year, the Students in Service program significantly improved on its performance of conducting and documenting criminal record checks on members having significant "recurring access" with a vulnerable population. The two questioned criminal record checks during the 2007-2008 grant year were actually completed and documented; however, the criminal record checks were over one year old. We will contact the member and the site supervisor to have the criminal record checks redone and documented so that both members are compliant with CNCS policies regarding criminal record checks. Going forward, we will be more diligent in conducting and documenting timely criminal record checks on members serving vulnerable populations. We believe we have excellent procedures in place that ensure criminal record checks are being completed where needed and are compliant with CNCS policies.

Finding 6. Members recorded service hours before contracts were signed.

We agree with the auditors' findings and explanation that the Students in Service program was unclear in understanding the CNCS policy that a member's contract must be signed on or before the enrollment date. It was our understanding that the member contract could be signed within 30 days of the official enrollment date.

Going forward, now that we are clear on the policy, we have revised our enrollment checklist and notified all of our campus partners and enrolling members that enrollment date does not start until all enrollment paperwork is signed (including the member contract) and satisfactory member identification is provided. This new policy will eliminate future findings regarding this policy.

Finding 7. WWU did not have documentation that end-of-term member performance evaluations were performed.

We agree with the auditors' findings and their explanation that we were unclear whether end-of-term evaluations were actually needed for EAP programs during the grant years tested. Even though we were not clear on the end-of-term member performance evaluation requirement, we did require that all members have their site supervisors complete an online site supervisor end-of-term evaluation. Going forward into the 2008-2009 grant year, we simplified the end-of-term site supervisor evaluation and created a one-page hard copy that campus partners can immediately review to determine whether the member performed satisfactory service. Also, the evaluation can become part of the completed member file. With the change in the site supervisor end-of-term evaluation and a change in related procedures, we are confident we will eliminate any future findings concerning end-of-term evaluations.

Finding 8. WWU did not complete some member enrollment, exit, and change-of-status forms and enter them into WBRIS in a timely manner.

Over the last two grant years, we have made significant strides in improving our performance regarding the 30-day compliance rule for enrollments, exits, and change-of-status. We have trained our campus partners about the policies and have been extra diligent about administering the program in a compliant manner. For example, in both the 2007-2008 and 2008-2009 grant years, our average enrollment date to approval date is now 8 days, significantly under the required 30 days to be in compliance. Going forward, we will continue to strengthen our policies, procedures, and controls in regard to the 30-day rule and will be diligent in notifying CNCS in a timely manner.

Finding 9. WWU did not retain documentation of member attendance at pre-service orientation sessions.

It is the policy of the Students in Service program that all prospective members are required to review an online pre-service orientation and complete a questionnaire that informs them about AmeriCorps and the Students in Service program. The pre-service orientation helps determine eligibility, and their level of interest in the Students in Service AmeriCorps program. After completing the online pre-service orientation, a potential member is required to contact the Students in Service campus coordinator to schedule an in-person orientation before he/she can

Stuart G. Axenfeld
February 24, 2009
Page 4

enroll in the program. This has been the policy of the Students in Service program since the beginning of the 2006-2007 grant year and continues today.

It was unclear to the Students in Service program that campus partners were “required” to keep attendance at the scheduled in-person orientations. Some campuses kept their own records and some did not during the two grants years that were audited. However, now that we are clear on the policy that all campus partners must retain documentation of member attendance of the in-person orientations, we have trained our campus partners to keep an attendance schedule on file. Campus partners are constantly reminded to make sure all attendees of in-person orientations sign in on the Students in Service In-Person Orientation sign-in sheet. Reminders are posted at the beginning of the video orientation and the PowerPoint presentation orientation. In addition, sign-in sheets are checked during campus visits by the director of the Students in Service program.

Summary:

We have already reviewed the findings of the draft report from the audit of the Students in Service program and have made appropriate changes to our administrative procedures that will further strengthen our program compliance with CNCS policies. Also, each campus partner will receive 1–2 internal reviews per year during campus visits to further reinforce, train, and ensure that CNCS policies and procedures are being followed in the administration of the program.

Sincerely,



Jennifer Dorr
Executive Director
WWU–Washington Campus Compact

cc: Ron Huritz, Office of Inspector General Audit Manager

APPENDIX B

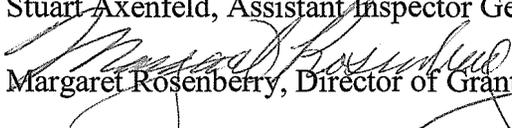
CORPORATION FOR NATIONAL AND COMMUNITY SERVICE

RESPONSE TO THE DRAFT REPORT

Corporation for
**NATIONAL &
COMMUNITY
SERVICE** 



To: Stuart Axenfeld, Assistant Inspector General for Audit

From:  Margaret Rosenberry, Director of Grants Management

Cc: William Anderson, Deputy CFO for Finance
Frank Trinity, General Counsel
Lois Nembhard, Acting Director of AmeriCorps National
Sherry Blue, Audit Resolution Coordinator

Date: March 9, 2009

Subj: Response to OIG Draft of Agreed-Upon Procedures of Education Award
Program Grants Awarded to Western Washington University –
Washington Campus Compact

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