2015-2016 AmeriCorps State Program Director Handbook

Serve DC – The Mayor's Office on Volunteerism

DC Commission on National and Community Service

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Message from the Chief Service Officer and Executive Director

Greetings Service Partners:

Serve DC – The Mayor's Office on Volunteerism is the DC Commission on National and Community Service, one of more than 50 State Service Commissions that administer federal Corporation for National and Community Service funds and coordinate national service initiatives at the state and local level. As the DC Commission and the District Government agency dedicated to promoting service as a solution to the challenges we face as a community and a nation, Serve DC strengthens the District's spirit of service through partnerships, national service, and volunteerism.

As an agency, Serve DC focuses on three primary functions – we administer funding for AmeriCorps national service programs in the District of Columbia; we train and mobilize residents to respond in the event of a disaster or an emergency; and, we promote episodic service opportunities to engage District residents in meaningful community service. In a larger sense, what our office does is provide District residents and community-based organizations with the tools and resources to address pressing social issues. However, Serve DC knows firsthand that government cannot do it alone. The support and engagement of partners like you is critical to achieving and sustaining community-driven progress and positive change. We know it takes a collective effort to move this city – our city, one city – forward.

We encourage you to get involved with and stay connected to our agency's work and mission. By working together, we can make the District a better place to live, work and visit.

In service,

Kristal Knight
Chief Service Officer and Executive Director
Serve DC – The Mayor's Office on Volunteerism

Introduction and Overview

This manual does not supersede any of the requirements established by the Corporation for National and Community Service (CNCS) in respect to terms, requirements, and provisions for AmeriCorps grants. The information in this manual does not include all of the legal requirements of the AmeriCorps grant, it is intended as a resource to support AmeriCorps State programs with the development of compliant program and fiscal operations. Please review CNCS guidance for managing AmeriCorps grants online at http://nationalservice.gov/build-your-capacity/grants/managing-americorps-grants.

Corporation for National and Community Service

The Corporation for National and Community Service (CNCS) is a federal agency that was established in 1993 and engages more than 5 million Americans in service each year through its AmeriCorps, Senior Corps, Social Innovation Fund, and Volunteer Generation Fund programs and leads United We Serve, the President's national call-to-service initiative. The Edward M. Kennedy Serve America Act of 2009 reauthorized and expanded national service programs administered by CNCS by amending the National and Community Service Act of 1990 and the Domestic Volunteer Service Act of 1973.

As the nation's largest grant maker for service and volunteering, CNCS plays a critical role in strengthening America's nonprofit sector and addressing our nation's challenges through service. CNCS harnesses America's most powerful resource – the energy and talents of its citizens – to solve problems. CNCS believe that everyone can make a difference and that everyone should try. From grade school through retirement, CNCS empowers Americans and fosters a lifetime of service.

In addition to the CNCS office in Washington, DC, there are CNCS State Offices that manage the AmeriCorps, VISTA and Senior Corps programs, which include RSVP, Senior Companion, and Foster Grandparent. The Director of the State Office typically serves as an ex-officio of the State Service Commission.

AmeriCorps

AmeriCorps programs involve more than 75,000 members across the country each year to meet urgent, local community needs. The bipartisan Edward M. Kennedy Serve America Act focused AmeriCorps' efforts in six key areas: disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families.

AmeriCorps State and National Direct

AmeriCorps State and National Direct members are sponsored by national, state, and local public and nonprofit organizations. To meet the specific needs of the communities they serve, these local AmeriCorps sponsors recruit and train AmeriCorps members. Funding for these programs comes directly through CNCS (National Direct AmeriCorps programs) or through State Service Commissions, such as Serve DC (AmeriCorps State

programs). Serve DC programs are part of a larger National Service network, and state-by-state national service program information can be found online at www.nationalservice.gov.

For AmeriCorps State funds, there are two primary pools of funds available: Competitive and Formula:

- *Competitive funds* are competed and reviewed at both the local and national levels with funding awards determined by CNCS. Fund availability is determined by Congress and priorities are set by CNCS.
- *Formula funds* are competed solely at the state level with awards determined by the State Commission (Serve DC). Fund availability is determined by Congress and allocated to State Commissions on a formula basis. State Commissions formally approve programs for formula funding and inform CNCS of decisions.

AmeriCorps VISTA (Volunteers In Service To America)

VISTA was founded as Volunteers in Service to America in 1965 as a national service program designed specifically to fight poverty in America. In 1993, VISTA was incorporated into the AmeriCorps network of programs. AmeriCorps VISTA members work full time in the communities they serve, creating programs that continue after they complete their service term.

AmeriCorps NCCC (National Civilian Community Corps)

AmeriCorps NCCC is a ten-month, full-time team-based residential service program for men and women ages 18-24. AmeriCorps NCCC campuses are located in Maryland, Colorado, Iowa, Mississippi and California. Members complete projects in different regions of the country. AmeriCorps NCCC combines the best practices of civilian service with the best aspects of military service, including leadership and team-building.

Serve DC – The Mayor's Office on Volunteerism

Serve DC – Mayor's Office on Volunteerism is the District of Columbia Government agency dedicated to promoting service as an innovative, sustainable solution to pressing social challenges. Serve DC engages District communities by building partnerships and organizational capacity, leading local and national volunteer and service initiatives, and providing and promoting meaningful service opportunities. Serve DC supports communities across the District through federal grant funds from the Corporation for National and Community Service (CNCS) and the US Department of Homeland Security (DHS).

History of Serve DC

Serve DC was established in 2000 by a Mayoral Executive Order to facilitate volunteerism and service initiatives throughout the District of Columbia. Serve DC engages District communities and residents through three distinct program areas: National Service, Emergency Preparedness, and Communications and Special Initiatives.

Seasons of Service Days

Serve DC requires that all programs have their participants participate in at least <u>two</u> national days of service, such as Global Youth Services Day, National Day of Service and Remembrance September 11, Make A Difference Day, or Martin Luther King, Jr. Day of Service. Participation in Seasons of Service will count toward member service hours. For additional information about Seasons of Service Days, visit Serve DC's website at www.serve.dc.gov.

National Service

Serve DC is the DC Commission on National and Community Service, one of more than 50 State Service Commissions that administer federal Corporation for National and Community Service funds and coordinate national service initiatives in the District. Serve DC manages the AmeriCorps State national service program, which provides ongoing service opportunities and addresses critical community needs, including funding, monitoring, and supporting AmeriCorps State programs in the District of Columbia.

Based on the 2013-2014 CNCS "National Service in Your State" report, more than 9,800 people of all ages and backgrounds are helping to meet local needs, strengthen communities, and increase civic engagement through national service in the District of Columbia. Serving at more than 1,500 locations throughout the state, these citizens tutor and mentor children, support veterans and military families, provide health services, restore the environment, respond to disasters, increase economic opportunity, and recruit and manage volunteers.

Serve DC also administers CNCS funds to support national service program development, training, disability inclusion, and a State Service Plan. As a convener for national service in the District, Serve DC supports cross-collaboration, continuous improvement of programming and resource development to ensure that national service sites are inclusive, comprehensive, and responsive to local community needs.

Emergency Preparedness

Serve DC recruits and trains District residents to respond and assist during emergencies – ensuring residents play a major role in making their communities safer, stronger and better prepared to address threats of terrorism, crime and disasters. As the District's lead for emergency volunteer and donations management, Serve DC provides critical volunteer support to the city's official emergency response effort in the first 72 hours of a crisis.

Serve DC provides free emergency preparedness training and volunteer opportunities as part of Citizen Corps, a national initiative designed to foster a culture of citizenship, service and responsibility. Citizen Corps' mission is to harness the power of every individual through education, training, and volunteer service to make communities safer, stronger, and better prepared to respond to the threats of terrorism, crime, public health issues, and disasters of all kinds.

Communications & Special Initiatives

Serve DC promotes volunteerism and service across the city with strategic community outreach and engagement. Serve DC manages a portfolio of service days, connects residents with meaningful volunteer opportunities, and establishes partnerships and collaboration among community- and faith-based organizations, the private sector, and local and federal government.

Serve DC Commission

By virtue of the Mayoral Order, a governing body of Commissioners plays an important role in the function of Serve DC. Commissioners are responsible for reviewing and approving all grant decisions for funds from CNCS. Within the District, the Mayoral-appointed Commission is responsible for recommending innovative and creative citywide service programs to increase volunteer participation in all age groups and providing community-based problem-solving among diverse participants.

District of Columbia State Service Plan

The State Service Plan is a State Commission's three-year strategy for coordinating national service and volunteer service activities across all streams of service. The State Service Plan creates a blueprint for addressing needs through service and expanding opportunities for District residents to serve to the fullest extent of their skills and abilities. By addressing local and national priority areas, the State Service Plan serves as a living document to guide focused activities around identified programmatic priority areas, demographic and inclusion priorities, collaboration, and accountability. The District of Columbia State Service Plan can be found online at http://serve.dc.gov/publication/dc-state-service-plan.

Serve DC Staff Roles

Chief Service Officer and Executive Director

The Executive Director provides oversight for all Corporation for National and Community Service sponsored grants; sets program goals; recommends, develops and implements policies and procedures; manages and tracks match requirements; and compliance monitoring.

Deputy Director

The Deputy Director creates, coordinates and evaluates the financial systems of programs; processes reimbursement requests; prepares program needs assessments and reports; and monitors program financial compliance.

AmeriCorps Program Officer

The AmeriCorps Program Officer is responsible for setting program goals; planning, coordinating, and implementing program evaluation; preparing reports for program evaluation; maintaining member time records; site development and compliance monitoring; working jointly with AmeriCorps program staff to resolve

program-related issues; and, processing reimbursement requests. The AmeriCorps Program Officer will share information, such as grant requirements, policies and procedures and best practices, with sub grantee staff.

AmeriCorps Grants

The information in this section outlines foundational information related to activities associated with AmeriCorps grants.

AmeriCorps Rules and Regulations

- *The Statute* is The National and Community Service Act of 1990 (Public Law 101–610, Nov. 16, 1990, 104 Stat. 3127) (42 U.S.C. 12501 et seq.) [As Amended Through P.L. 111–13, Enacted April 21, 2009]. The statute authorizes the federally funded initiative of AmeriCorps.

- *The Regulations* are CNCS's interpretations of the statute and set out the agency's purpose and powers, and the circumstances of applying the statute. Regulations are published in the Code of Federal Regulations (CFR). The AmeriCorps regulations can be found in Title 45 of the Code of Federal Regulations, Chapter 25, beginning with section 2520.10. Citations for Regulations are written like this: 45 C.F.R. §2522.230 or abbreviated as §2522.230.

- *AmeriCorps Provisions* are additional grant requirements. New Provisions are issued each year. Citations for Provisions are written like this: [AC I. B.2].

- *AmeriCorps State and National Policy FAQs* consist of links to various FAQs and policy guidance provided to grantees and subgrantees.

Reference: AmeriCorps website, "Manage Current Grants" section: http://www.americorps.gov/for_organizations/manage/index.asp

Other Requirements

- **State Laws***:* AmeriCorps program staff must be aware of state laws as applicable to the AmeriCorps program. This includes state laws pertaining to taxes, workers compensation, background checks, etc.

- **OMB Uniform Administrative Requirements** are issued by the federal Office of Management and Budget (OMB) and outline administrative requirements and cost principles for nonprofit organizations, state and local governments, and educational institutions using federal funds. Understanding Uniform Administrative Requirements is critical to operating a compliant federal grant. More information can be found online at http://www.whitehouse.gov/omb/circulars/index.html.

AmeriCorps Prohibited Activities

The following activities must not be engaged in while charging time to the AmeriCorps program, accumulating service and/or training hours, or performing activities supported by the AmeriCorps program or CNCS staff and members. The sub grantee also must not use grant funds (either Serve DC or matching funds supporting staff or member time and effort) to support the following activities:

- Attempting to influence legislation
- Organizing or engaging in protests, petitions, boycotts, or strikes
- Assisting, promoting or deterring union organizing
- Impairing existing contracts for services or collective bargaining agreements

- Engaging in partisan political activities or other activities designed to influence the outcome of an election to any public office
- Participating in, or endorsing, events or activities that are likely to include advocacy for or against political parties, political platforms, political candidates, proposed legislation, or elected officials
- Engaging in religious instruction; conducting worship services; providing instruction as part of a program that includes mandatory religious instruction or worship; constructing or operating facilities devoted to religious instruction or worship; maintaining facilities primarily or inherently devoted to religious instruction or worship engaging in any form of religious proselytizing
- Providing a direct benefit to:
  - For-profit entities
  - Labor unions
  - Partisan political organizations
  - Organizations engaged in the religious activities described in the preceding sub clause, unless grant funds are not used to support the religious activities
  - Nonprofit entities that fail to comply with the restrictions contained in section 501(c) (3) of U.S. Code Title 26
- Organizing or conducting voter registration drives. In addition, Corporation funds may not be used to conduct a voter registration drive.
- Providing abortion services or making referrals to such services, this includes members enrolled prior to October 1, 2009. In the past, AmeriCorps members have joined with clinics that offer abortion services and partnered with Planned Parenthood chapters to work on public health education topics. The new stipulation will allow members to volunteer or provide their services on their own time, but not while affiliated with AmeriCorps.
- Other activities, as Serve DC determines will be prohibited upon notice to the AmeriCorps State sub grantee. Individuals may exercise their rights as private citizens and may participate in the above activities on their initiative, on non-AmeriCorps time and using non-Corporation funds. The AmeriCorps logo should not be worn while doing so.

Also, a Member's service activities may not include:

- Raising funds for his or her living allowance
- Raising funds for an organization's operating expenses or endowment
- Writing grant applications for AmeriCorps funding or for any other funding provided by CNCS
- Writing grants applications for funding provided by any other federal agency

AmeriCorps Eligibility

There are several requirements for AmeriCorps membership and this section outlines detailed information regarding citizenship/allowable legal status, Educational Attainment, and criminal history background checks. All information pertaining to AmeriCorps Eligibility can be found in 45 CFR 2522.200

Citizenship or Allowable Legal Status Requirement

To be eligible to serve as an AmeriCorps Members, an individual must satisfy the Citizenship Requirement at time of enrollment.[1] A significant change in documenting citizenship is that sub grantees will no longer need to provide proof of citizenship documents in the Member File. From CNCS website:

In 2012, the Corporation announced that the process for verifying the identity and citizenship status of individuals applying to serve in AmeriCorps has been automated. By law, to serve in an approved AmeriCorps position, an individual must be a citizen, national, or lawful permanent alien of the United States (42 U.S.C. 12602(a)(3)). With the signing of this agreement, upon an individual accepting a position, the individual's information will be automatically reviewed by the Social Security Administration within 3 business days. If the individual's information is verified, the AmeriCorps grantee or sponsor will not need to do anything. The individual's status will appear as "Verified" in their My AmeriCorps account and in eGrants for your records. If the individual's information cannot be automatically verified by the Social Security Administration, sub grantees will receive an email regarding next steps which will include a request for documentation. For both grantees and sponsors in this scenario, the grantee or sponsor will need to review and verify the individual's documentation and provide copies to CNCS. Within eGrants, the status of an individual's identity and citizenship review can also now be seen at any time and this information must be accessible to Serve DC staff for monitoring and auditing purposes.

Additional information can be found online at: www.americorps.gov.

Primary documentation of status as a United States' citizen or national:

- A birth certificate showing that the individual was born in one of the 50 states, the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, American Samoa, or the Northern Mariana Islands
- A United States passport
- A report of birth abroad of a U.S. Citizen (FS–240) issued by the State Department
- A certificate of birth-foreign service (FS 545) issued by the State Department
- A certification of report of birth (DS–1350) issued by the State Department
- A certificate of naturalization (Form N–550 or N–570) issued by the Immigration and Naturalization Service
- A certificate of citizenship (Form N–560 or N–561) issued by the Immigration and Naturalization Service

Primary documentation of status as a United States' lawful permanent resident alien:
- Permanent Resident Card, INS Form I–551
- Alien Registration Receipt Card, INS Form I–551
- A passport indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence
- A Departure Record (INS Form I–94) indicating that the INS has approved it as temporary evidence of lawful admission for permanent residence.

Although the combination of obtaining a driver's license or government-issued identification and Social Security card are acceptable forms of identification for the I-9 Federal Employment Eligibility Form, these documents are not sufficient for proving United States Citizenship.

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[1] Sec. 2522.200 of 45 CFR.

Educational Attainment

CNCS requires that AmeriCorps members have a high school diploma or GED by the time they utilize the Eli Segal Education Award.[2] Members are allowed to complete classes towards their GED during their year of service to satisfy this requirement if necessary. An AmeriCorps member will not be eligible to utilize the Award unless they have satisfied the Educational Attainment Requirement.

- **High School Diploma/GED:** In cases such as the Tutoring Program Requirement, where members must meet education requirements, each site must obtain a written declaration from the member that they have received their high school diploma or GED. It is strongly encouraged that programs obtain a copy of the member's diploma, GED, or official transcript and place it in their member file; a program can place a memo-to-file if they have attempted to obtain the required document and have been unsuccessful. College diplomas do not satisfy the requirement.

  A program may accept a self-certification from the potential member as proof of high school graduation. Applicants do not have to produce a high school diploma or an equivalency certificate nor are programs required to retain a copy of the high school diploma or other documents confirming education level, such as an official transcript. However, a self-certification must include the person's signature, under penalty of law, specifically certifying that he or she has completed high school or its equivalent or will obtain a high school diploma prior to using the education award[3].

- **GED Agreement Letter:** If a member does not have a GED or a high school diploma, the member must sign the GED Agreement Letter which states that the member will obtain a GED by end of the service term. The letter must also include a projected date of completion and the stated penalty of loss of Education Award if the GED is not obtained. *An example of a GED Agreement Letter can be found in Appendix 4.*

Criminal History Background Check Requirements

Under the Serve America Act (SAA), all grantees must conduct National Service Criminal History checks on participants and program employees in AmeriCorps and any other programs funded by CNCS laws. All employees, participants, and others who receive a salary, national service education award, living allowance, or stipend under CNCS grants, even if the activities do not involve service with vulnerable populations. (Vulnerable populations include children age 17 or younger, persons age 60 and older, and/or individuals with disabilities. ''Individuals with disabilities'' has the same meaning given to the term in the Rehabilitation Act in 29 U.S.C. 705(20)(B), and includes any person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.) They must receive the checks prior to beginning employment or service. An individual is ineligible to serve in an AmeriCorps program if they:

1) Refuse to consent to a State Criminal Registry and FBI Check
2) Make a false statement in connection with a Program's inquiry concerning the individual's criminal history
3) Are registered or required to be registered on a State Sex Offender Registry
4) Have committed murder

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[2] Sec. 2522.200 a.2 and Sec. 2522.200 b of 45 CFR.
[3] AmeriCorps FAQ B.11

Programs must be able to document scanned or an attached consent form including a signed statement from candidate agreeing to undergo checks and candidate's understanding that the position is contingent on results. *Please see Appendix 6 for National Service Criminal History Check Consent Form Model Language.*

All AmeriCorps sites must administer a two-part criminal history check consisting of a State Criminal Registry and National Sex Offender Public Registry (NSOPR) check on all "covered positions." These positions include AmeriCorps members, volunteers, and grant-funded staff (this includes staff funded by match) enrolled in their program, as well as any staff included in the AmeriCorps budget with the exception of individuals holding covered positions as of September 30, 2009. An FBI check, which serves as a third check, must be administered on those who have recurring access to vulnerable populations.

NSCHC Steps Checklist
Follow these steps to clear individuals

Remember, staff members from your program must be cleared with the NSCHC before they can charge hours to your CNCS grant.

☐ Verify identity through government-issued photo identification (maintain documentation)

☐ Get written consent from candidates to perform checks (maintain documentation)

☐ Document candidate's understanding that his or her position is contingent on eligibility determined by the results of the NSCHC (maintain documentation)

☐ Determine check types. Access to vulnerable populations will determine components of the NSCHC needed

☐ Select sources. When going through a vendor; make sure you are getting results from CNCS-approved sources

☐ Perform a free, nationwide NSOPW search before candidate begins work or service (maintain documentation)

☐ Initiate and pay for additional check component(s). State(s) and/or FBI checks must be ordered before candidate begins work or service (maintain documentation)

☐ Provide accompaniment while checks are pending when service or work involves vulnerable populations (maintain documentation)

☐ Document receipt date when check results arrive (maintain documentation)

☐ Consider check results, as cleared candidates can now become fully instated (maintain documentation)

☐ Cease accompaniment once a candidate has cleared the state or FBI check

☐ Provide opportunity to review finding, being mindful of Civil Rights laws and particularly when negative results surface

☐ Maintain results, while providing confidentiality

If your program enrolls members in a consecutive term of service and the member has less than 120-day break in their service, your organization does not need to re-check the covered position, as long as the original check is a compliant check. Sub grantees must conduct checks on individuals in covered positions who begin work or start service 1) following a break in service exceeding 120 days or 2) with a new sub grantee.

Requirements and specifics of background checks are listed below[4]:

- *National Sex Offender Public Website (NSOPW)*: This check must be completed on the potential member upon application to your program, using the National Sex Offender Public Website (www.nsopw.gov). The information provided on this website is public information and no fees are charged. This check must be completed and documented (date of search must be included in the print out or electronic copy) before the covered position has access to a vulnerable population and the covered position starts their term of service. If the check was less than complete, you must recheck the NSOPW to rule out the possibility that the applicant may be registered in the State(s) system(s) that was not connected to the NSOPW system when you performed the first check. If all states are not reporting for NSOPR, go to the individual states not reporting and search database from state website. Finally, as a prudential action, all sub grantees when conducting a search of the name-based NSOPW, should include not only the applicant's current legal name, but also any previous names or aliases by which the applicant may have been known. Individuals cannot begin serving under the grant until this check is complete.

- *Statewide Criminal Registry*: The regulations require AmeriCorps programs to search the designated statewide criminal repository for the State in which the program operates and the State in which the applicant resides at the time of application. **This check must be initiated by the AmeriCorps Program upon enrollment or hiring of the individual into the program**. Initiation is one step more than getting permission to conduct the checks. This could include fingerprinting mailing requests to obtain checks to the State repository, having forms for checks filled out by candidates, etc. You must be able to document how and when checks were initiated. You must also have policies and procedures outlining how you initiate checks and consistently apply them.[5]

The CNCS Designated Repository Agency for Washington, DC is the Metropolitan Police Department Records Department. Please see www.mpdc.dc.gov and http://mpdc.dc.gov/page/police-clearances-arrest-and-criminalhistory-section. At this time there are no Alternative Statewide Source approved by CNCS. Listing of Required State Criminal History Information Repositories and Alternatives can be found online at https://www.nationalserviceresources.org/national-service-criminal-history-check-resources.

- *Federal Bureau of Investigation (FBI)*: The National Service Criminal History Check will consist of three parts for individuals who are predicted to have recurring access to a vulnerable population (those who are 17 or younger, 60 and older, or have a disability). An FBI check will no longer substitute for the one or two required State repository checks. CNCS defines "recurring access" as "the ability on more than one occasion

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[4] Sec. 2540.203 of 45 CFR
[5] FAQ s 11/30/12

to approach, observe, or communicate with an individual through physical proximity but not limited to, electronic or telephonic communication."[6]

Currently, unless a program is operated by a law enforcement agency, programs cannot request or directly receive FBI checks. Some programs obtain them by:

- Using the State Repository: Many State criminal history repositories that offer finger print-based statewide checks also offer FBI checks. The FBI prefers that programs use State repositories to obtain FBI Criminal History Record Information (CHRI), and State repositories can be the fastest way to obtain the FBI check. Some State repositories have identified a point of contact in their office, informed them of our requirements, to assist our programs. A list of such contacts identified so far is attached.

- Asking the individual to request his/her own FBI check. Individuals can ask the FBI for their own CHRI. These records arrive unscreened, presenting the full FBI database information. See: http://www.fbi.gov/about-us/cjis/background-checks/background_checks.

- Using local law enforcement agencies. Some programs work with their local law enforcement agencies to obtain FBI and statewide checks.

- Using checks conducted by program partners. Some placement site partners (e.g., public school systems, nursing homes, etc.) may perform checks that include FBI records.

Accompaniment

While results from the State or FBI criminal history check components of the National Service Criminal History check are pending, subgrantees may allow individuals in pending positions with recurring access to vulnerable populations to begin work or start service, the individual must be accompanied by:

- an authorized subgrantee representative who has previously been cleared for such access
- a family member or legal guardian of the vulnerable individual
- an individual authorized by the nature of his or her profession to have recurring access to the vulnerable individual, such as an education or medical professional

Accompaniment is a higher standard than supervision in that it requires the individual with recurring access to vulnerable populations to be in the physical presence of the accompanying individual[7].

Episodic Access

Congress granted those individuals in covered positions with recurring access to vulnerable populations an exception to the FBI fingerprint-based criminal history check requirement when their access to vulnerable populations is "episodic in nature or for a [one]-day period." For the purpose of this final rule, CNCS defines "episodic" as access that is not regular, scheduled, and anticipated component of an individual's service activities. If access to vulnerable populations is not regular, scheduled, and anticipated component of an individual's service activities, the subgrantee is not required to conduct a finger-based FBI criminal history check. However, the subgrantee must conduct the other component of the National Service Criminal History Check.

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[6] Sec. 2510.20 of 45 CFR
[7] Sec. 2540.205 of 77 CFR

CNCS recommends that subgrantees specifically address contact with vulnerable populations in each position description, service agreement, or similar document describing an individual's service activities[8].

Criminal History Background Check Policies and Procedures

An AmeriCorps site must have procedures in place for soliciting, completing, and documenting both Criminal History Checks. *A National Service Criminal History Check Documentation Checklist can be found in Appendix 7. Procedures must include the following*:

- Verification of identity of the individual

- Acquiring prior, written authorization to complete the State Criminal Registry and FBI Check (not required for the NSOPR check). *For National Service Criminal History Check Consent Form Model Language, please see Appendix 6.*

- Documenting the individual's understanding that selection is contingent upon the review of both Criminal History Checks

- Providing reasonable opportunity for the individual to challenge the factual accuracy before action is taken

- Providing safeguards to ensure confidentially

- Ensuring individuals with pending State Criminal Registry checks are supervised while interacting with vulnerable populations

- Document identity was verified/checks performed

- Maintaining all original documentation with date verification (printout)

- Document that selection was based on results

- Program pays for the costs of the check. CNCS considers the cost of this required National Service Criminal History Check a reasonable and necessary program grant expense, such costs being presumptively eligible for reimbursement. In any event, a subgrantee should include the costs associated with its screening process in the grant budget it submits to CNCS for approval. This rule codifies CNCS' guidance that a grantee may not charge an individual for the cost of a check unless CNCS has given written permission to do so.

- Requesting of alternate search protocol when necessary

Criminal History Background Check Resources

- District of Columbia: www.mpdc.dc.gov and http://mpdc.dc.gov/page/police-clearances-arrest-and criminalhistory-section.   At this time there is no Alternative Statewide Source Approved by CNCS.

- National Sex Offender Public Registry Check: www.nsopr.gov

- State Criminal History Information Repositories and Alternatives: https://www.nationalserviceresources.org/national-service-criminal-history-check-resources

- FBI: http://www.fbi.gov/about-us/cjis/background-checks/background_checks https://www.nationalserviceresources.org/files/obtaining-fbi-fingerprint-checks-01-14-13-version.pdf

- CNCS: https://www.nationalserviceresources.org/national-service-criminal-history-check-resources

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[8] Sec. 2540.207 of 77 CRF

FEDERAL COMPLIANCE CHECKLIST

Federal Compliance Requirements	
Complete NSOPR check before work begins	✔
Determine how and from where (sources) the checks must be obtained	✔
Verify identity with government photo identification	✔
Pay for the checks	✔
Perform accompaniment while checks are pending	✔
Maintain the results of the checks	✔
Provide opportunity for review of findings	✔
Keep information confidential	✔
Maintain Documentation (see below)	✔

Documentation: What You Must Create and Retain

- Document that you verified the individual's identity with a government-issued photo ID
- Document and obtain written authorization prior to initiating checks
- Document initiation of checks.
- Document that the individual understands selection is subject to Check results
- Document accompaniment while checks are pending and the individual has access to vulnerable populations.
- Document that you conducted the checks
- Document that you considered the results of the checks.
- Maintain the results of the Check components: NSOPW, State(s), FBI*

* To retain anything else in lieu of the actual results, such as a clearance letter from a school, requires approval of an ASP.

Alternative Search Protocol

If the program would like to use an alternative criminal background check, other than those listed above, the program must obtain an Alternate Search Protocol (ASP) from CNCS. This applies to those who use alternate searches provided through school systems, commercial vendors, and screening authorities (other than National Center for Missing and Exploited Children, no approval needed) instead of the statewide criminal history repository. The program must first request approval from Serve DC who will then seek the ASP from CNCS. CNCS maintains instructions for requesting an ASP on Knowledge Network website under "National Service Criminal History Check Resources" http://www.nationalserviceresources.org/national-service-criminal-history-check-resources. Please complete and submit the form included in the guidance as part of your submission.

ALTERNATE SEARCH PROCEDURE (ASP)

Are the correct required sources used? (NSOPW, State repositories, and FBI) → **Is there access to check results for oversight & monitoring?** → **Are the results coming from the primary source for a state?** → **Are all requirements found in regulations followed?**

… if one or more "no" answers, then an ASP is **needed**.

What to Include in Your Request for an ASP:

- Identify the specific element(s) of the requirements that you would vary from.

- Describe the alternative process/system you plan to use to conduct a criminal history check.

- Provide a detailed description (if applicable) of the substantially equivalent source you propose using instead of the designated sources/alternates.

- If prohibited by state law, attach a copy of the statute or prohibition along with a legal analysis from either the Attorney General or legal counsel. Please submit where applicable a rejection letter from the CNCS designated repository.

- Perform accompaniment for those with recurring access to vulnerable populations while ASP decision is pending.

Requesting an ASP : Complete and submit the ASP submission form : http://www.nationalserviceresources.org/files/asp-request-guidance-8-16-12.pdf. Email your completed request to ASPRequests@cns.gov and copy your Program and Grants Officers.

If you are receiving clearance letters instead of the actual results from a partner or non-designated source/alternate, please include a copy of the written agreement you have in place to ensure that murder and sexual offenses deem an individual ineligible to serve and that no appeals can overturn this eligibility determination for the purposes of serving/working under a National Service program.

If you are using a vendor, secure an analysis of the product/services as they relate to our requirements on a state-by-state basis. For vendors going to CNCS designated sources, please ensure they are not limiting their search to 7 years, but go as far back as the designated source has records. Also, ensure that if they are retaining the results on behalf of the program, that the records are accessible for monitoring and oversight purposes for the required length of time for your program. Please see CNCS Vendor guidance for more information: http://www.nationalservice.gov/sites/default/files/resource/nschc_-_vendor_guidance.pdf.

CNCS has approved an Alternative Search Procedure (ASP) to continue its current policy on accompaniment beyond January 1, 2013. This ASP applies to all programs and projects with individuals in covered positions with recurring access to vulnerable populations. This means that for individuals in covered positions for whom a National Service Criminal History Check requires both state and FBI components[9] , the program or project may

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[9] Sec. 2540.203 of 45 CFR.

elect to cease accompaniment of the individual when it has received results from either the state component or the FBI component and does not need to receive results from both components before electing to cease accompaniment. This temporary extension of CNCS's current policy will continue until further notice.

Please Note: An individual may not serve or work in a covered position prior to completing the nationwide NSOPW search component[10].

This limited ASP does not relieve programs of any other National Service Criminal History Check obligations or requirements.

Use of the AmeriCorps Name and Logo

AmeriCorps program websites must use the AmeriCorps logo and the Serve DC logo. Grantees and subgrantees must use the AmeriCorps name and logo on service gear and public materials such as stationery, application forms, recruitment brochures, recruitment materials, orientation materials, member curriculum materials, signs, banners, press releases, and publications related to their AmeriCorps program in accordance with CNCS requirements.

Reference: "Graphic Standards: A Users Guide" at http://www.nationalservice.gov/pdf/graphic_standards.pdf. Programs can also order/download free National and Community Service materials from the CNCS website: https://pubs.nationalservice.gov/Default.aspx. For the Serve DC logo, please contact the AmeriCorps Program Officer.

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[10] Sec. 2540.206 of 45 CFR.

AmeriCorps Recruitment, Selection and Orientation

AmeriCorps Member Position Description

The key to successful recruitment and engagement of AmeriCorps members is creating a comprehensive AmeriCorps Member Position Description. The Position Description is how you will "sell" your program to prospective members. It must also align with goals and objectives in the program's approved grant proposal and it must also adhere to AmeriCorps rules and regulations for allowable member activities.

All AmeriCorps Member Position Descriptions should include at least the following:

- Overview of your agency and member expectations
- A paragraph describing your organization's mission and work
- A list of the duties and responsibilities of the member position
- A list of required and preferred qualifications which include
    1) Citizenship or proof of legal residency
    2) High School or GED education
    3) 17 years of age or older
- Education Award amount
- A description of benefits, if applicable: stipend amount, health insurance, loan deferment, and other benefits, tangible and otherwise
- A list of all the necessary criminal history background checks Members must agree to conduct – National Sex Offender Public Registry, State criminal check, and FBI check
- A short sentence or two about any unique opportunities offered—advanced training in a particular skill, for example, or anything that is unique about your community
- Contact or resource for requesting additional information;
- Equal Employment Opportunity Council and American with Disabilities Act language ("will not discriminate against a member on the basis of race, color, religious creed, ancestry, union membership, age, sex, sexual orientation, national origin, disability, nor political affiliation")
- Term of service and hours requirement

Serve DC will request member position descriptions for review within the first 30 days of the program year.

My AmeriCorps Portal

The CNCS-hosted website, www.my.americorps.gov, allows AmeriCorps programs, once approved for funding, to post available AmeriCorps positions free of charge and provides a searchable database for prospective members. Organizations can post service opportunities to the My AmeriCorps Portal through the Member Management Portal in eGrants.

Here are step-by-step instructions to create a service opportunity through eGrants to be posted on the My AmeriCorps Portal:

1. On the main screen of eGrants, select 'Recruitment' under "View My AmeriCorps Portal"

2. Select "Service Opportunities" on the Recruitment Workbasket screen.

3. Select "Create Opportunity Listing"

4. Fill in the appropriate information specific to your Service Opportunity on the proceeding screens

The eGrants system will not let you proceed until all required information (noted with a red star) is filled in.
You can decide to make the Service Opportunity immediately available or save the information to post at a later date.

For more information on using the My AmeriCorps Portal, please visit the CNCS National Service Knowledge Network online at: http://nationalserviceresources.org/ac-training-support-state. In addition, My AmeriCorps includes comprehensive online help, frequently asked questions, and an enhanced customer service feature, "Contact My AmeriCorps," to get answers needed about the programs or the system. For more information on My AmeriCorps, visit http://www.americorps.gov/for_organizations/members/index.asp.

AmeriCorps Member Enrollment

Once your organization has recruited qualified individuals to serve in your AmeriCorps Program, it will be time to enroll the members into your organization and into the required AmeriCorps systems. Enrollment in the My AmeriCorps Portal must be done within 30 days of the member start date. In the past, programs were required to submit hard copies of enrollment. This is no longer necessary since enrollment is done on the Portal. The 30 day period of time also applies to exiting members from the program. This is a requirement of the grant and enrollment/exit reports are reviewed by Serve DC and Corporation staff. Additionally, Serve DC requires all subgrantees to enroll members into the OnCorps system. This is required for member timekeeping, progress reports, and approval of Periodic Expense Reports (PERs).

Service Location Designation

In the My AmeriCorps Portal, programs are required to create accurate operating sites and service locations for their members. This requirement will allow for better tracking of resources, increase transparency, align with federal-wide open government initiatives, enhance communication among national and state stakeholders, and build capacity to accurately tell the story of national service.

Member Forms

My AmeriCorps makes frequently used and requested forms available online at any time. This will allow Members to:
- Modify contact information (address, email address)
- View and print 1099 forms
- Complete Loan Forbearance forms
- Complete Interest Accrual Benefit requests
- Access to Service Certification forms
- Use all of the features and forms that were available in the AmeriCorps Online Payment System

- Complete Member Surveys (to include the End of Term Exit Survey)
- Connect to Alumni Services

Enrollment Policy

Member enrollment refers to the number of slots filled divided by the number of slots awarded. Programs that are not able to reach 100% enrollment may be required to develop a corrective action plan and low enrollment rates adversely affect the program's risk level and may reduce the amount of grant allocation in future years. Serve DC reserves the right to recommend a smaller amount of AmeriCorps members in a subgrantees' second or third year of funding based on enrollment, retention, and graduation rates.

Refill Policy

Eligible programs that have fully enrolled their awarded member slots are allowed to replace any member who terminates service before completing 30% of his/her term. Programs may not refill the same slot more than once. If a member leaves with compelling personal circumstances, the slot cannot be re-filled if the exited member accepts a partial Education Award.

As a fail-safe mechanism to ensure that CNCS resources are available in the National Service Trust to finance any Member's Education Award, Serve DC will suspend refilling if either the total AmeriCorps program enrollment reaches 97% of awarded slots or the number of refills reaches 5% of awarded slots.

Subgrantees whose awards have special grant conditions are not eligible to refill positions. In order to qualify for refilling, subgrantees will be evaluated on the basis of the outcomes of Inspector General Audits, site visits, and oversight by Serve DC program and grant officers. Serve DC must forward all changes and appropriate forms to the Corporation after approval. Any requests for changes that fall outside of the parameters set forth above must come to the Corporation for written approval with concurrence from Serve DC.

AmeriCorps Member Supervision

Quality supervision and mentorship is critical in helping to maximize the benefits of service for the member and the organization. AmeriCorps Members should be supervised by qualified staff of your organization and should not be supervised by other AmeriCorps Members. AmeriCorps Members cannot be supervised by other AmeriCorps Members because it potentially violates the non-displacement requirement of the AmeriCorps Regulations[11]. Additionally, AmeriCorps Members look to their supervisors for guidance, mentorship, and other professional development opportunities.

Always provide supervision to your AmeriCorps Members. AmeriCorps Members cannot acquire service/training/fundraising hours during time when they are unsupervised. AmeriCorps Members cannot complete service tasks from home or in any other location where they are unsupervised. For more information on Member Supervision, see http://encorps.nationalserviceresources.org/supervisors_toolkit.php.

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[11]Sec. 2540.100, Subpart A of 45 CFR

Remember to:
- Provide ongoing supervision through regularly scheduled meetings with your member(s). Focus on reviewing and developing service plans to achieve objectives;
- Maintain open communication with member(s);
- Identify and document training needs and opportunities for professional development for the member;
- Involve the member in appropriate staff meetings, retreats, and training events;
- Provide direct and honest feedback on all aspects of the member's performance on a regular basis-positive aspects as well as constructive criticism.

Service Objectives

Outlining service expectations with applicants and revisiting those expectations at orientation and regular intervals with AmeriCorps members ensures that there is a clear understanding of what the member should accomplish over the course of the service year. Objectives should focus on outcomes within the community which are clearly linked to service activities and the program's performance measures.

In order to facilitate the full understanding of member expectations:
- Review specific responsibilities of the service year
- Outline goals and objectives for program success
- Provide projects, tasks, and assignments throughout the year that allow the member to develop and exercise leadership
- Communicate periodically regarding the progress and attainment of goals and objectives
- Revisit objectives periodically and revise them if necessary. Please be sure to keep the AmeriCorps Program Officer informed of any changes that may require Serve DC approval
- Ensure supervisors/site partners delegate activities to AmeriCorps Members that are allowable:
  a. The AmeriCorps members may perform direct service activities that will advance the goals of your program, will result in a specific identifiable service or improvement that otherwise would not be provided, and that are included in, or consistent with, your CNCS-approved grant application.
  b. Direct service activities generally refer to activities that provide a direct, measurable benefit to an individual, a group, or a community
  c. Examples of the types of direct service activities AmeriCorps Members may perform include, but are not limited to, the following:
     - Tutoring
     - Helping to run an after-school program
     - Engaging in community clean-up projects
     - Providing health information to a vulnerable population
     - Teaching as part of a professional corps
     - Providing relief services to a community affected by a disaster
     - Conducting a neighborhood watch program as part of a public safety effort[12]

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[12] Sec. 2520 – 2520.65

Please note that service activities should NOT include clerical work, research, or fundraising unless such activities are directly related to the service project and do not exceed the percentage established by CNCS. Regulations state that Fundraising hours cannot exceed 10% of the member's total time; training hours cannot exceed 20% of the member's total time.[13]

AmeriCorps Member Service Agreement/Member Contract

This is the contract that Members and supervisors must sign before the start of service that details the working arrangement for their term of service, including requirements of their service, duties, and discipline policies.[14] Failure to sign before the start of service will result in loss of accrued time and reported expenses if signed after the start of service. The AmeriCorps Program must ensure that there is an alignment with all enrollment documentation with start dates as designated in My AmeriCorps Portal and OnCorps.

Member Agreements/Contracts must state the member's position description, outline the term of service (start date and end date *must* fall within the grant year awarded to your organization), term of service (full-time, half-time, etc.), the benefits associated with term of service, standards of conduct, specified prohibited activities, requirements under the Drug-Free Workplace Act, suspension and termination rules, circumstances under which a member may be released for cause, grievance procedures, and any other requirements established by the subgrantee. *An example AmeriCorps Member Contract can be found in Appendix 2.*

The program should ensure that the service agreement is signed before commencement of service so that members are fully aware of their rights and responsibilities. The program must require that each member sign a service agreement that, at minimum, includes the following:

- Member position description
- Minimum number of service hours (as required by statute) and other requirements (as developed by the subgrantee) necessary to successfully complete the term of service and to be eligible for an Education Award
- Amount of the Education Award being offered for successful completion of the terms of service in which the individual is enrolling
- Standards of conduct, as developed by the grantee or subgrantee
- Prohibited activities, including those specified in the regulations at 45 § CFR 2520.65
- Non-duplication and non-displacement requirements as specified in the regulations at 45 § CFR 2540.100 (e)-(f)
- Fundraising requirements as specified in the regulations at 45 § CFR 2540.100
- Requirements under the Drug-Free Workplace Act (41 U.S.C. § 701 et seq.)
- Civil rights requirements, complaint procedures, and rights of beneficiaries
- Suspension and termination rules
- Specific circumstances under which a member may be released for cause
- Member signature and date (before or on service start date)

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[13] Sec. 2520.45 and 2520.50 of 45 CFR.
[14] AmeriCorps Provision 2014 IV.D.2

- Grievance procedures
- Other requirements established by the subgrantee

Member Orientation

Members who begin their service year well oriented to their placement site have the greatest potential for increased productivity and personal growth. All AmeriCorps State programs are required to document that each member has received an orientation. Documentation includes a copy of the orientation agenda(s). This information can be kept with program administration files.

Orientation should include:

- Review the history and background of the organization to include mission, goals, structure, and current programs.
- Provide appropriate equipment, materials, and a workspace to members to ensure an adequate and safe working environment.
- Provide a handbook and written materials about your organization and community.
- Enable the member to spend time with other program staff, board members, and community residents in order to get a broader picture of the organization and the community.
- Share organizational norms and rules. Although AmeriCorps members are technically staff or volunteers, they should be treated as "first-year employees" with regard to policies and procedures.
- Formally introduce the member to the service placement site stakeholders and discuss goals and expectations.

Program staff should set aside time to formally meet with the member to provide an opportunity for clarifying organizational expectations regarding:

- AmeriCorps Member Agreement*
- Organization Policies and Procedures
  - Sick leave, vacation, personal leave and holiday policies*
  - Grievance procedures*
  - Work schedule and lunch breaks*
  - Time and attendance reporting*
  - Reimbursement policies for service related travel
  - Dress code and/or uniform
  - Reasonable accommodation*
  - Telephone and computer protocol and etiquette
  - Participation in meetings and trainings
  - Formality and language (addressing others by last or first name, titles)
  - Rules of confidentiality (customer/client information, organizational information)
  - Representation (including who may speak to the press)
  - Fundraising
  - Professionalism
- AmeriCorps Member benefits* (as applicable to the term of service, most benefits are only available to full-time members)

- o   Living Allowance
- o   Health Insurance
- o   Child Care
- o   Loan Forbearance
- o   Education Award

These items must be reviewed by all AmeriCorps members serving with your organization.

AmeriCorps Pledge

During the orientation, members should be asked to take the AmeriCorps pledge:

I will get things done for America—to make our people safer, smarter, and healthier.
I will bring Americans together to strengthen our communities.
Faced with apathy, I will take action.
Faced with conflict, I will seek common ground.
Faced with adversity, I will persevere.
I will carry this commitment with me this year and beyond.
I am an AmeriCorps member, and I will get things done.

AmeriCorps Member Benefits

Loan Forgiveness, Forbearance and Interest Accrual Payments

Members must be made aware that they can request forbearance to a loan holder via MyAmeriCorps Portal. Members enrolled in an AmeriCorps project are eligible for forbearance and interest accrual payment for most federally-backed student loans. Member files must document that the member is aware of this benefit. For other types of student loans, the member should ask their loan holder if their AmeriCorps service qualifies them for a deferment or forbearance. To access and complete the forms for forbearance or interest accrual payment, the member must be registered at www.my.americorps.gov. Once a Member successfully completes a term of service, they can request CNCS to pay for the interest accrued on their loans while they had been in forbearance.

Note: The interest accrual payment is considered taxable income during the year that CNCS provides it to the member.

Health Insurance

Except for Educational Award Programs, Professional Corps, or Members covered under a collective bargaining agreement, the subgrantee must provide, or make available, healthcare insurance to those members serving a 1700-hour term (Full Time) who are not otherwise covered by a healthcare policy at the time each begins his/her term of service. The subgrantee must also provide, or make available, healthcare insurance to members serving a 1700-hour full-time term who lose coverage during their term of service as a result of service or through no deliberate act of their own. CNCS will not cover healthcare costs for family members.

Programs may provide health insurance to less-than-full-time members serving in a full-time capacity, but they are not required to do so. For purposes of this provision, a member is serving in a full-time capacity when his/her regular term of service will involve performing service on a normal full-time schedule for a period of six weeks or more. A member may be serving in a full-time capacity without regard to whether his/her agreed term of service will result in a full-time Segal AmeriCorps Education Award.

Living Allowance

AmeriCorps Programs must provide a modest living allowance to all Full-Time AmeriCorps Members and programs have the option of providing living allowances to less than Full-Time members. Pay periods are determined by the program. However, each member must receive a living allowance in equal amounts over the term of service regardless of absences.[15] Deductions should be made for federal and state income taxes (where applicable) and FICA. Members must submit timesheets for each service period to the program. Members should not log zero hours during a pay period, but if they do, they should still be paid their living allowance.[16] If a member is not completing service for a long period of time, based on your policies and procedures, the member should be suspended. A program is not required to provide the member's living allowance to the member while they are suspended.

Service Term	Minimum # of Hours	Minimum Living Allowance	Maximum Total Living Allowance
Full-time	1700	$12,530	$25,060
One-year Half-time	900	n/a	$13,265
Reduced Half-time	675	n/a	$9,950
Quarter-time	450	n/a	$6,635
Minimum-time	300	n/a	$4,420

Note: Member timesheets do not determine the rate of pay or frequency.

Paid Absences

Vacation, holiday, and sick time will vary with each program. Members must follow policies and procedures indicated in the member contract for requesting paid time off. Paid absences are not counted as service.

Childcare

Full-time AmeriCorps Members have the benefit of applying for Child Care Coverage provided by CNCS. Members are not eligible to receive childcare from AmeriCorps while they are receiving childcare subsidies from another source for the same period of AmeriCorps service. The childcare subsidy is provided to eligible members through GAP Solutions, Inc.

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[15] AmeriCorps Provision 2014 IV.G.1.
[16] AmeriCorps FAQ C.25

AmeriCorps Child Care
GAP Solutions, Inc.
12054 North Shore Drive
Reston, VA 20190

For household income, provider credentials and other qualifying requirements, CNCS uses the rules determined by the state in which the care is provided. All applications will continue to be reviewed and applicants will be notified of their approval or denial. All invoices will be reviewed and all that are complete will be paid. Please see www.nationalservice.gov for additional information.

Eli Segal AmeriCorps Education Award

Supervisors must share with members that they will be eligible to receive an Education Award upon successful completion of all program requirements. The Award amount will be based on the term of services and the number of service hours completed. The Award can be used to pay for attendance at a qualified institution of higher education and to repay qualified student loans for a period of up to seven years after the completion of service. The award is considered taxable income in the year(s) that it is used. Please see www.nationalservice.gov and http://edaward.org/ for additional information. Programs must confirm Education Award Amounts by the fiscal year.

Term of Service	Minimum Number of Service Hours	Segal Education Award Amount
Full-Time	1,700	$5,730.00
Half-Time	900	$2,865.00
Reduced Half-Time	675	$2,182.78
Quarter-Time	450	$1,515.55
Minimum-Time	300	$1,212.44

Education Award Transfer

The Edward M. Kennedy Serve America Act law authorizes individuals to transfer the Education Award with limitations on who can transfer an award and who can receive a transferred award. The Education Award can be transferred to an individual's child, grandchild, or foster child.

To transfer an Education Award, an AmeriCorps member must:

- have earned the award in an AmeriCorps State or National Direct Program
- have been aged 55 or older on the date the approved term of service began
- have begun that term of service on or after October 1, 2009

The member may transfer all or a portion of the unused Education Award. Once transferred, it is still possible to revoke any unused amount prior to the expiration of the Award. However, please note that a transfer for each eligible Award can only take place once. The recipient to whom the award is transferred can use the award to

pay the cost of attendance at qualified institutions of higher learning or to pay qualified student loans. The recipient can receive transfers from multiple Awards but only up to the current value of two full-time Awards. If a member wishes to transfer the Award, they can do so by logging in to their My.AmeriCorps.gov.

Education Award Limitation

The maximum numbers of terms that you can serve in each AmeriCorps program are:

- Four for AmeriCorps State and National
- Five for VISTAs
- Two for NCCC

Full-time, half-time, reduced half-time, quarter time, and minimum time terms of service each count as one term of service. More information on award limitation is available at: http://www.nationalservice.gov/programs/americorps/segal-americorps-education-award

Government Benefit and Assistance Programs

Depending on the type of service program and the type of government benefits, it is critical that AmeriCorps members are aware of how AmeriCorps service may impact eligibility and access to government benefit and assistance programs. Benefits.gov is a website that provides citizens with easy, online access to government benefit and assistance programs. Each program description provides citizens with the next steps to apply for any benefit program of interest.

Resource: http://www.benefits.gov/

Supplemental Security Income (SSI)/ Social Security Disability Insurance (SSDI)

The Social Security Administration (SSA) administers Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). The HEART (Hero Earnings Assistance and Relief Tax) Act of 2008 specifies that any cash or in-kind benefit paid to a participant in the AmeriCorps program is excluded from the SSI income calculation. This means that SSI recipients can freely serve as AmeriCorps members without the fear of losing their SSI. Knowing that the impact of service on eligibility for government benefits is critical, program managers can take the following steps to increase participation, alleviate concerns, and ensure retention of individuals with disabilities in service programs:

- Inform all applicants and participants that guidance is available regarding the relationship between participation and eligibility for government benefits.
- Encourage participants to notify the government benefits agency (e.g., Social Security Administration) that they will be participating in service to identify any potential problems as well as ways to address those problems.
- Emphasize the availability of work incentives and other policies that might lessen any adverse impact on SSI or SSDI benefits.

- Develop working relationships with local Social Security offices and with local organizations to raise the level of awareness among all involved about ways to ensure that participation in national service will not result in a loss or reduction in disability benefits.

Resource: National Service Inclusion Project website online at http://www.serviceandinclusion.org/

Supplemental Nutrition Assistance Program (SNAP)

An AmeriCorps member with less than $2,000 in assets (checking and savings accounts) may qualify for SNAP assistance. SNAP benefits can be used to purchase food and seeds, but they cannot be used for alcoholic beverages, tobacco, hot foods, pet foods, soap and paper items, or other non-food items. The U.S. Department of Agriculture funds the SNAP program, but each state administers the program. Programs in D.C., Maryland, and Virginia have slightly different procedures for obtaining food stamps and members should contact the appropriate state office to learn more about eligibility and the application process.

Resource: http://www.fns.usda.gov/snap

Temporary Assistance to Needy Families (TANF)

Temporary Assistance to Needy Families (TANF) is one of the programs that may be affected by the living allowance. If your AmeriCorps member is already receiving TANF, please have them contact their case manager to report his/her status as an AmeriCorps member.

Resource: http://www.acf.hhs.gov/programs/ofa/programs/tanf.

AmeriCorps Member Management

Performance Evaluation

Supervisors play a crucial role in fostering a member's professional and personal development. Program managers have the ability to observe member performance and give feedback to support member development.

Serve DC has the following expectations regarding member performance:
- All Full-Time and Half-Time AmeriCorps members must be assessed at the mid-point of the term of service. AmeriCorps programs may complete these evaluations for less than half-time members, but it is not required. This document must include the number of hours completed to date and how many hours the member has left to serve. Mid-Term Evaluations must be signed by the program supervisor. Mid-Term Performance Evaluations are not required for members who exit before the mid-point of their terms, but an End-of-Term Performance Evaluation must be completed for these members.

- Evaluate the member mid-term and at the end of his or her agreed upon term of service.

  o Use your organization's appraisal form if it more accurately reflects the feedback process established with the member.

- A copy of both the mid-term and the end of term evaluations must be placed in the member's file. Both evaluations must be signed and dated by the member and the supervisor.
- The evaluation should provide a summary of the feedback given to the member over time and a summary of the member's service hours at the time of the evaluation.

End-of-Term Evaluations must include the following:[17]

- Whether the member completed the required number of hours making them eligible for an Education Award
- Whether the member was released with compelling and personal circumstances making them eligible for an Education Award
- Whether the member was released for cause making them ineligible for an Education Award
- A discussion of the member's ability to satisfactorily complete assignments
- Whether the member has met other performance criteria that were clearly communicated at the beginning of the term of service.

Rules of Conduct

AmeriCorps programs must establish rules of conduct for AmeriCorps Members. Members are not participate in the specified prohibited activities and should abide by the program's rules of conduct, which may include:

- Demonstrating mutual respect toward others
- Following supervisor directions and working on assignments in a reliable and conscientious manner
- Keeping accurate and precise time records that are checked and signed by the site supervisor and forwarded to the local service site at the agreed upon time
- No proselytizing or assisting religious activities, influencing legislation or an election, aiding a partisan political organization, helping or hindering union activity, or aiding a for-profit business
- No verbal or physical harassment that disrupts or interferes with another's performance or which creates an intimidating, offensive or hostile environment
- No sexual harassment

Disciplinary Action

There may be times when more direct and documented feedback is required regarding member conduct or performance. The program managers should follow CNCS-established grievance procedures listed in the member agreement and/or the suggested steps below:

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[17] AmeriCorps Provision 2014 IV.D.5; AmeriCorps Rulemaking published in the Federal Register Vol. 73, No. 181

- Speak to the member about the issue and update the program director of the incident. Document the incident in the member's file. It is important to document challenges and corresponding attempts to correct the problems.

- Give a verbal warning to the member, clearly describing the problem and the steps that are necessary for improvement. Document the conversation by creating a memo to the member's file.

- If the problem persists, give a written warning describing the problem with performance and the steps that are necessary for improvement. If the steps are not taken, the program manager may take the necessary disciplinary actions found in the member contract or the organization's policies. Document in the member file.

- If there is still no improvement, the member may be released from their term of service for "cause" after the supervisor has contacted the AmeriCorps Program Officer and they agree that release is appropriate.

Terms of Service

Release from Service

Members may be released for two reasons: "cause" or "compelling personal circumstances." "Cause" is defined as violating the rules of conduct and or participating in the prohibited activities, dropping out of the program without obtaining a release, being charged with a violent felony or the sale or distribution of a controlled substance, or any other serious breach that in the judgment of the program manager, would undermine the effectiveness of the program. Participants must disclose their release for cause on any subsequent applications to AmeriCorps programs.

"Compelling personal circumstances" include those that are beyond the participant's control, such as, but not limited to:

- A participant's disability or serious illness;
- Disability, serious illness, or death of a participant's family member if this makes completing a term unreasonably difficult or impossible; or
- Conditions attributable to the program or otherwise unforeseeable and beyond the participant's control, such as a natural disaster, a strike, relocation of a spouse, or the nonrenewal or premature closing of a project or program, that make completing a term unreasonably difficult or impossible;

Those that CNCS, has for public policy reasons, determined as such, including:

- Military service obligations;
- Acceptance by a participant of an opportunity to make the transition from welfare to work; or
- Acceptance of an employment opportunity by a participant serving in a program that includes in its approved objectives the promotion of employment among its participants.

Note: Acceptance to a college or university or the acceptance of an employment offer does not constitute a compelling personal circumstance.

A participant who is released for compelling personal circumstances and who completes at least 15% of the required term of service is eligible for a pro-rated Education Award. The amount of the Award is calculated based on the percentage of successful hours completed. The member has the primary responsibility for demonstrating that compelling personal circumstances prevent the participant from completing the term of service. The program must document the basis for any determination that compelling personal circumstances prevent a participant from completing a term of service.[18] If a member is to be released from service for either of the above reasons, the program must complete all required paperwork (Exit Form and End-of-Term Performance Evaluation) and place them in the member's file.

Extended Terms of Service

Compelling Personal Circumstances

The program may place a member on suspension and extend the member's term of service beyond one calendar year due to the same compelling personal circumstances listed above. Please consult with the AmeriCorps Program Officer for approval and appropriate procedure as this may require approval from CNCS.

If the member is placed on suspension due to compelling personal circumstances as described above, the member will cease to receive benefits including the stipend under the program. The member's new end-of-term date will be extended by the number of days the member was on leave. Once the member is reinstated, the member must begin receiving their stipend until completion of service.

Second-Term Eligibility

A second year of service should not be considered as a member right or entitlement. To be eligible for a second year of service with AmeriCorps:

1. Members must receive satisfactory end of year performance reviews and demonstrated an expanded scope of responsibilities at their site
2. Funds must be made available through CNCS and Serve DC

Retention

Retention refers to the number of AmeriCorps members that exit the program successfully with either a full Education Award or a partial/pro-rated Education Award. Serve DC and the Corporation expect programs to maintain a 100% retention rate. Those who meet less than an 85% retention rate will be assessed more closely and may be required to provide a Corrective Action Plan.

Serve DC will take any written and documented retention difficulties into consideration when reviewing an application and monitoring a program. Recruitment and retention percentages may be used to determine a program's risk designation and may be taken into consideration when determining funding decisions that could result in the loss of funding. Retention percentages will be assessed prior to a formal site visit, when the Grantee Progress Report is due in December, and at the end of the year.

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[18] Sec. 2522.230 of 45 CFR.

Living Allowance Distribution and Member Time/Attendance

Living Allowance Distribution

Please also see **[AC IV.G.1]**. A living allowance is not a wage. Subgrantees must not pay a living allowance on an hourly basis. Subgrantees should pay the living allowance in regular increments, such as weekly or bi-weekly, paying an increased increment only on the basis of increased living expenses such as food, housing, or transportation. Payments should not fluctuate based on the number of hours served in a particular time period, and must cease when the member's service ceases.

If a member serves all required hours and is permitted to conclude his or her term of service before the originally agreed upon end of term, the grantee may not provide a lump sum payment to the member. Similarly, if a member is selected after the program's start date, the grantee must provide regular living allowance payments from the member's start date and may not increase the member's living allowance incremental payment or provide a lump sum to make up any missed payments.

AmeriCorps EAPs may provide a living allowance or other in-service benefits to their members, but are not required to do so. Full-cost and other Fixed Amount grantees must provide a living allowance to their members.[19]

Taxes and Insurance

Requirements related to member living allowances and benefits are in [45 CFR §§ 2522.240 and 2522.250]. In addition, subgrantees must ensure that the following procedures are followed:

a. *Liability Insurance Coverage*: The subgrantee is responsible for ensuring adequate general liability coverage for the organization, employees and members, including coverage of members engaged in on- and off-site project activities.

b. *FICA (Social Security and Medicare taxes)*: Unless the subgrantee obtains a ruling from the Social Security Administration or the Internal Revenue Service that specifically exempts its AmeriCorps members from FICA requirements, the grantee must pay FICA for any member receiving a living allowance. The subgrantee also must withhold 7.65% from the member's living allowance.

c. *Income Taxes*: The subgrantee must withhold Federal personal income taxes from member living allowances, requiring each member to complete a W-4 form at the beginning of the term of service and providing a W-2 form at the close of the tax year. The subgrantee must comply with any applicable state or local tax requirements.

d. *Worker's Compensation*: Subgrantees must check with State Departments of Labor or Serve DC to determine worker's compensation requirements. If worker's compensation is not required, subgrantees must obtain

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[19] AmeriCorps Provision 2014 IV.G.1

Occupational, Accidental, and Death and Dismemberment coverage for members to cover in-service injury or incidents.[20]

Member Time and Attendance

AmeriCorps program managers are responsible for verifying the accuracy of and signing member timesheets.

- Members are responsible for completing their own timesheets and submitting them to the site supervisor for review and verification.

- Members must sign their completed timesheets. Qualified supervisors are responsible for verifying the accuracy of and signing the timesheets. Supervisors cannot sign and date a timesheet before members have signed and dated their service log.

- Member timesheets track of the member's time and ensures completion of the required number of hours to qualify for an Education Award.

- The timesheets must account for time related to training, direct service, and fundraising. Timesheets distinguish between the member's hours to comply with all federal regulations to include no more than 20% of member time on training and no more than 10% of member time on fundraising.

- Document where the member's service is completed at a service location

Please Note: Travel time to and from activities does not count towards service, fundraising, or training hours. However, if travel is needed during the service day to fulfill the essential functions of the job, those hours can be counted as service hours. Additionally, each Full-Time member (and any other type of member working in a Full-Time capacity) must include a lunch break on their timesheets. Lunch breaks are not allowed to be counted toward service hours. The program must develop a policy about lunch hours and other non-service hours and train members on the policy. Members should report whether or not they have taken a lunch break during their work day. If lunch was not taken members should list out what activities they were doing while working through lunch. Lunch should be noted in "comments" section of OnCorps.

Archiving Timesheets on OnCorps

Programs are required to download member timesheets quarterly. This will serve as backup in case OnCorps is not accessible. Program directors can download by going to *Timekeeping>Member Hours>Print or ZIP* member hours. You can either download the files as one large PDF or "zip" set of member timesheets categorized by member.

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[20] AmeriCorps Provision 2014 IV.G.3

AmeriCorps Member Records

Electronic Recordkeeping

The subgrantee must maintain records, including the position description, sufficient to establish that each member was eligible to participate and that the member successfully completed all program requirements for 3 years after the submission of the final FFR. In the case of an audit starting prior to the expiration of the 3-year period, the records must be retained until the audit findings have been resolved and final action taken. A program may store member files electronically if the program can ensure that the validity and integrity of the record is not compromised. CNCS will recognize electronically stored files where:

The electronic storage procedures and system provide for the safe-keeping and security of the records, including:
- Sufficient prevention of unauthorized alterations or erasures of records
- Effective security measures to ensure that only authorized persons have access to records
- Adequate measures designed to prevent physical damage to records
- A system providing for back-up and recovery of records

The electronic storage procedures and system provide for the easy retrieval of records in a timely fashion, including:
- Storage of the records in a physically accessible location
- Clear and accurate labeling of all records
- Storage of the records in a usable, readable format

Where there is a requirement for a signature on a record, electronically stored records must include an image of the original signature; records without signatures, when required, are considered incomplete.

AmeriCorps Member File Documents

A critical administrative responsibility for AmeriCorps Program Managers is the maintenance of AmeriCorps member files. These files are required by CNCS and Serve DC to ensure compliance with statutory regulations. The following are the content requirements of the member file. Discrepancies in files or additional information related to the member file must be documented and requires a "memo to file". *A sample AmeriCorps Member File Checklist can be found at http://www.nationalservice.gov/sites/default/files/resource/member-ho1-file-checklist-4-13-12.pdf.*

- **Member Enrollment Form**: Programs must demonstrate that members have been enrolled in the MyAmeriCorps Portal.

- **Member Application or Resume**: include the completed member application and/or the resume submitted to apply for the position.

- **Photo Identification:** For background check purposes an official picture I.D must be included in the member file.

- **Proof of citizenship or allowable legal status**: a print-out from Portal or provide hard copies if citizenship status information is rejected from the Portal.

- **Proof of Age**: AmeriCorps members must be at least 17 years of age to be able to serve.[21] If a member is under 18 at the time of enrollment, they must get parental consent to serve.[22] Your organization must solicit parental consent for the member to serve before the member begins their term of service. The parental consent form must be maintained in the AmeriCorps member's file.

- **Educational Attainment Document(s)**: Proof of GED or high school diploma or statement that member agrees to earn one prior to using the Education Award. *Please see Appendix 4 for a GED Agreement Letter Example.*

- **Tutoring Requirement (if applicable)**: documentation that members who are tutors have met the tutoring qualification requirements established [Sec. 2522.900-950]. *Please see Appendix 3 for a Tutoring Requirement Checklist.*

- **I-9 Federal Employment Eligibility Form**: A standard employment form can be found here: http://www.uscis.gov/files/form/i-9.pdf.

- **W-4 Tax Withholding Form**: A standard employment form that is required if the member will be receiving a living allowance. For a copy of this form, visit: www.irs.gov/pub/irs-pdf/fw4.pdf.

- **Criminal Background History Checks**: Printed copies of National Sex Offender Public Registry Check (with date of printing), State Criminal Background Check, and FBI Criminal History Check. Programs must be able to document dates of checks, initiation, and accompaniment while check results were pending. Please see http://www.nationalservice.gov/sites/default/files/resource/steps-in-the-nschc-process.pdf for a National Service Criminal History Check Documentation Checklist.

- **Written Consent for Criminal History Checks:** Scanned or attached consent form, including a signed statement from candidate agreeing to undergo checks and candidate understands that position is contingent on results. *Please see Appendix 6 for an example form*.

- **AmeriCorps Member Agreement/Contract**: **http://www.nationalservice.gov/sites/default/files/resource/member_-_ho3_agreement_4-13-12.doc**

- **Proof of Health Care Enrollment or Health Care Enrollment Waiver**: To provide proof of health insurance either a health insurance card or an official letter stating the member's health plan information must be included in the member file. If a Full-Time member already has health insurance coverage for the duration of the term of service, programs must include documentation of that coverage in the member file. **Note:** Please do not include medical condition information or disability disclosure/accommodation information in the member's file. These documents should be placed in a separate locked file cabinet/box.

- **Child Care Benefit Enrollment Documents or Waiver of Benefit**: If a member decides to utilize this benefit, the AmeriCorps program must maintain documentation in the member's file. All full-time AmeriCorps members must sign a waiver of this benefit if they decide not to utilize this benefit. The waiver must also be maintained in the member's file.

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[21] Sec. 2522.200 of 45 CFR.
[22] AmeriCorps Provision 2014 IV.C.2.

- **Media Release:** Members must sign a photo release form (or include it in the Member Contract/Agreement) that will enable their pictures to be used in publications.[23] Members under 18 years of age must have parental consent.

- **Documentation of Loan Forbearance**: Must document to verify members are aware of benefit of ability to request forbearance to loan holder via MyAmeriCorps Portal (loan forbearance is only available to full-time members).

  - Serve DC recommends that programs consolidate all enrollment and waiver information into one acknowledgement form or into the member contract for members to sign off on. *See Appendix 5 for a sample form.*

- **Member Timesheets:** Time and attendance records of members' service are required in OnCorps. Timesheets must:

  - Note location of service performed

  - Separate time for direct service, training, and fundraising

  - Separate lunch hours (lunch hours cannot be counted towards hours required for completion of the program)

  - If a program is using another electronic system in addition to OnCorps it must meet the following three conditions:

    - A written policy is in effect establishing the use of electronic timekeeping system as your system of record

    - A secure, verifiable electronic signature system (a) identifies and authenticates a particular person as the source of the electronic signature; and (b) indicates such person's approval of the information contained in the electronic message

    - Once appropriate electronic signatures have been applied, no changes may be made unless there is a clear, auditable record of the revision

  - Hardcopy timesheets are permitted however Serve DC prefers that programs use OnCorps as the sole member time recorder. If a program chooses to use hardcopies in addition to OnCorps, timesheets must be signed in ink by both the AmeriCorps Member and their direct supervisor within a reasonable amount of time from the date of the service performed.

- **Mid-Term Performance Evaluation:** Required for Half-Time or Full-Time Members.

- **Documentation of Member Discipline and Change of Status:** All programs must maintain copies of 'Change of Status' forms from the eGrants Member Management System and document suspensions of service in the Member File. Member Files must include documentation of release of any member for compelling circumstances or for cause.

- **End of Term/Exit Form:** The member exit process qualifies members for the Education Award and also documents early exits. As this process takes place in the My AmeriCorps Portal/eGrants system, it is sufficient for programs to confirm that information in the Portal. Programs must have printed documentation from the Portal in individual member files to document member exit. Members must be exited in the Portal within 30 days of the end of the term of service.

- **End-of-Term Performance Evaluation /Exit Interview:** Must include required hours and if satisfactory completed. If programs are unable to get excited members to sign off on exit document, the program should

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[23] AmeriCorps Provision 2014 IV.G.3.

document attempts to reach the unresponsive member(s). Those attempts must be added to the member file.

AmeriCorps Training and Development

AmeriCorps Member Training

AmeriCorps programs should seek to provide ongoing professional development opportunities for members related to the service activities and leadership skill development. Serve DC seeks to convene members in professional development opportunities and encourages AmeriCorps State and National programs to collaborate when possible.

*Resources (*Please see Appendix 9 for an *AmeriCorps Training Survey Example)*
- http://learning.nationalserviceresources.org/
- http://www.nationalservice.gov/resources/performance-measurement/americorps
- http://edaward.org/
- http://www.nationalservice.gov/resources/online-courses
- http://www.nationalservice.gov/resources/member-and-volunteer-development/encorps/training-and-development-topics

Member Development Plan

Each program must use service experiences to help members achieve the skills and education needed for productive, active citizenship, including the provision, if appropriate, of structured opportunities for members to reflect on their service experience. Specifically, supervisors work with members to create an "Individual Development Plan" which outlines personal development goals to be achieved during the term of service, and how the AmeriCorps Supervisor will support attaining these goals. For samples, visit http://www.nationalservice.gov/resources/member-and-volunteer-development.

DC AmeriCorps Leadership Council

Serve DC manages the DC AmeriCorps Leadership Council (DCALC) to provide current members with a leadership opportunity to organize service, social and professional development opportunities for members serving in Washington, DC. Serve DC will share the application process with AmeriCorps programs. Selected DCALC members commit to monthly meetings from the fall through June. Serve DC will release application information late summer. Additional information on the DCALC can be found on Facebook at http://serve.dc.gov/page/dc-americorps-leadership-council.

AmeriCorps Program Staff Training and Technical Assistance

Each fall, Serve DC distributes an online training and technical assistance assessment to gauge the performance level of National Service program directors. Each program manager must submit a complete Training and Technical Assistance Needs Assessment Survey. Results from the assessment are used to create Serve DC's yearly training and technical assistance calendar.

As an AmeriCorps program funded by Serve DC, the program manager or his/her designee must attend program manager meetings, orientations, training events and statewide special events, as stated in the AmeriCorps State Grant Award Agreement. Serve DC offers individualized training and technical assistance to AmeriCorps State subgrantees if the requested training is not listed on the yearly training calendar. An AmeriCorps subgrantee must submit a request in writing to the AmeriCorps Program Officer for additional training and technical assistance.

Training and Technical Assistance Resources

Serve DC Newsletter

Serve DC distributes a monthly Serve DC Newsletter to National Service sites operating in the District of Columbia. It provides up-to-date information about upcoming trainings, meetings, and events coordinated by Serve DC and community partners. Each AmeriCorps program manager is automatically added to the distribution list for this newsletter. If other AmeriCorps organization staff would like to be added to the distribution list, please visit the Serve DC website at www.serve.dc.gov .

Websites

Serve DC

The Serve DC website, www.serve.dc.gov, includes information related to agency initiatives, events, and professional development opportunities related to National Service, Emergency Preparedness, and Communications and Special Initiatives. From the Serve DC website you can also link to agency social media.

AmeriCorps in DC

The Serve DC AmeriCorps in DC website at www.dcamericorps.org is a one-stop for information on AmeriCorps specific to the District of Columbia.

Corporation for National Community Service

The Corporation for National Community Service website, www.nationalservice.gov, includes all information relevant for National Service programs and includes program and fiscal guidance for grants management and updates on national initiatives related to CNCS.

Knowledge Network

The Corporation's National Service Knowledge Network website, http://www.nationalservice.gov/resources, is a one-stop for National Service resources including an effective practices database where programs can post effective practices; conference and training calendar; online tutorials; and service-related links. Tutorials for AmeriCorps sub grantees: http://www.nationalservice.gov/sites/default/files/resource/checklist-for-new-staff-of-americorps-subgrantees-or-sites.pdf.

National Service Learning Clearinghouse

The National Service Learning Clearinghouse website, https://gsn.nylc.org/clearinghouse, is a one-stop for service learning models, techniques, and methodologies that includes online publications; effective practices database; funding sources and resources; and service-learning resources.

EnCorps

The EnCorps website, http://www.nationalservice.gov/resources/member-and-volunteer-development/encorps/encorps-resources-support-member-recruitment-and, is focused on assisting National Service program staff in finding and sharing proven practices for recruiting and developing successful National Service participants. It includes resources for member recruitment, selection, management, and support.

Listservs

CNCS /AmeriCorps State and National

All AmeriCorps State programs are encouraged to subscribe to CNCS listservs for AmeriCorps State and National. This forum is an opportunity for AmeriCorps State and National programs to ask questions, share best practices, and keep up-to-date with AmeriCorps. It includes relevant CNCS updates. A directory of CNCS listservs can be found: http://www.nationalservice.gov/programs/americorps/americorps-state-and-national.

DC Resource Library

Serve DC's DC Resource Library is located at the agency office and has resources available for use by agency partners. Materials in the library include topics such as service-learning, program management, leadership, community building, tutoring, literacy, volunteer management, training, fundraising, grant writing, sustainability, and risk management. Individuals may borrow the material(s) for one month. For example, if the program checks out a material on March 7th, it is due to Serve DC on April 7th.

The program must return the resource(s) to the Serve DC office by the due date. If a program requires the material(s) for more than one month, they must contact the AmeriCorps Program Officer at to request an extension. If there is not a waiting list for the borrowed resource(s), the extension will be granted for an additional month. The limit for borrowing is two months.

Disability Inclusion Initiative

Serve DC encourages individuals with physical or mental disabilities to participate as AmeriCorps members through AmeriCorps programs operating in the District of Columbia. **Subgrantees must ensure that AmeriCorps Members are aware of disability inclusion policies and procedures to include reasonable accommodations.** All information related to the Serve DC Disability Inclusion policies and procedures can be found on the Serve DC website at www.serve.dc.gov.

Disability Definition

According to the Americans with Disabilities Act (ADA), with respect to an individual, the term "disability" means a physical or mental impairment that substantially limits one or more of the individual's major life activities; a record of having such an impairment; or being regarded as having such an impairment. "Major life activities" mean functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, working, etc. Additionally, a "qualified individual with a disability" is an individual with a disability who, with or without reasonable accommodations, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the program.

Policy

Under Federal law, any program that receives federal funds is required to comply with the requirements of the ADA and Section 504 of the Rehabilitation Act. In compliance with the Federal law, all National Service programs prohibit any form of discrimination against persons with disabilities in recruitment, as well as in service. No qualified individual with a disability shall, by reason of disability, be excluded from participation in or be denied the benefits of the program, services, or activities of the program, or be subjected to discrimination by the program. Nor shall the program exclude or otherwise deny equal services, programs, or activities to an individual because of the known disability.

Serve DC Disability Inclusion Guide Plan

AmeriCorps State grantees are required to submit a completed Guide Plan annually. AmeriCorps State programs will use the Guide Plan to develop steps towards a more inclusive service environment.

Reasonable Accommodation

A reasonable accommodation is any modification or adjustment to a program site that will enable a qualified applicant, National Service participant, or National Service-funded employee with a disability to participate in the application process or to perform essential service or job functions. Reasonable accommodation also includes adjustments to assure that a qualified individual with a disability has rights and privileges in service equal to those of individuals without disabilities. All National Service programs shall make reasonable accommodations in practices and/or procedures when the accommodations are necessary to avoid discrimination on the basis of disability. Accommodations are "reasonable" when they are practical or feasible. The program does not have to provide reasonable accommodations that would impose undue hardship on the operation of the program.

Procedure for Requesting Reasonable Accommodation

Unless otherwise indicated in Serve DC sponsored-event registration instructions, when requesting reasonable accommodations for a Serve DC-sponsored event where a National Service member is serving in the capacity of his or her service program, Serve DC asks that the program site submits their request to Serve DC at least ten business days prior to the event. Any requests for a non-Serve DC sponsored event must include submission of the reasonable accommodation application per the outlined guidelines. If the request is submitted past this

date, Serve DC cannot guarantee completion of the request. All requests for reasonable accommodation must be submitted by the National Service program on behalf of a National Service member acting in that capacity. The Review process for Reasonable Accommodation Requests and all relevant materials, policies, and procedures can be found on the Serve DC website at www.serve.dc.gov.

AmeriCorps Program Management

As an AmeriCorps Program Manager, your responsibilities include, but are not limited to, recruiting and selecting members, supervising and training members, observing programmatic and fiscal responsibilities, enrolling and exiting members, and reporting to Serve DC and CNCS as appropriate.

You will find the requirements for AmeriCorps programs in the following documents:

- AmeriCorps State Grant Agreement issued by Serve DC
- AmeriCorps Regulations*
- AmeriCorps Provisions*
- Uniform Administrative Requirements (referenced in your AmeriCorps State Site Grant Award Agreement)
- The National and Community Service Act of 1990*, as amended
- AmeriCorps proposal (application) and modifications to it that may have been negotiated
- AmeriCorps State budget, which contains the maximum amount of CNCS funds provided and obligations for matching funds and/or in-kind contributions.

* For the most updated versions of the documents above, please see www.nationalservice.gov

AmeriCorps State Site Grant Award Agreement

All programs will receive an AmeriCorps State Grant Award Agreement that outlines all responsibilities of the grant. The agreement will outline terms and conditions for the grant as related to local and Federal requirements. The full award agreement package must be kept on file by the program and available for review by Serve DC staff.

Program Amendments

It is required that a program reports to Serve DC staff turnover in management or supervisory positions, changes in partner/sponsor relationships, changes in board membership, significant participation attrition, service sites, and other significant changes. Programs are required to notify the Serve DC AmeriCorps Program Officer within 10 days of the change regardless of whether you will include the information in your next progress report. An email to the AmeriCorps Program Officer is acceptable.

Slot Conversions and Corrections

Slot Conversion

As of November 13, 2006, CNCS revised the slot conversion policy to allow programs to convert one Full-Time position to up to three Quarter-Time positions. A slot conversion is necessary when a program wants to convert an unfilled slot into less time slots. All conversions will be Trust neutral, are subject to availability of funds in the Trust, and will comply with all assumptions on which Trust prudence and continued solvency are predicated.

This policy allows AmeriCorps slots to be converted in accordance with the grant award (AmeriCorps General Provision, Section 8, Terms of Service) but without regard to the limitation therein on increasing the number of slots in the program. Thus, when converting a slot to one requiring fewer hours, the subgrantee is not limited to a one-for-one slot conversion, and may increase the number of members correspondingly. However, the total number of MSYs and education award amounts in the grant may not increase as a result of the slot conversion.

For example:
- 1 full-time member position (1 MSY and a $5,550 education award) may be converted into 2 half-time slots (2 x .5 members = 1 MSY) and a total education award amount of $5,550 (2 x $2,775).

- 1 full-time member position may not be converted into 4 quarter-time positions as the education awards would total $5,872 (4 x $1,468); in this example, the maximum number of allowable quarter-time positions would be 3.

Subgrantees may also combine and convert less than full-time positions to full-time positions as long as such changes do not increase the total MSYs or total education award amounts awarded in the grant.

From zero to 90 days after the program start, programs are permitted to request slot conversions based on the slot conversion policy and the chart below. All slots starting out less than 1700 hours will be converted one to one (i.e. one 900-hour slot can be converted to one 675-hour slot). All other requests will be dealt with on a case by case basis and does not guarantee approval by the AmeriCorps Program Officer. Once approved, the request will be sent to the CNCS grants officer.

Although the My AmeriCorps Portal allows for subgrantees to make their own slot conversions, all Serve DC subgrantees must follow the above procedure to request slot conversions. If a program plans to makes a slot conversion, approval must be obtained from the Serve DC AmeriCorps Program Officer to ensure the change is compliant.

Following is a list of conversions and timelines which are acceptable. However, we would appreciate that a formal request be filed prior to making a substantive adjustment.

	After 90 Days	After 180 Days	After 225 Days
Full-Time (1700-hour)	Converts to Half-Time	Converts to Quarter-Time	Cannot be filled
Half-Time (900-hour)	Converts to Quarter-Time	No change	Cannot be filled
Reduced Half-Time (675-hour)	Converts to Quarter Time	Cannot be filled	Cannot be filled
Quarter-Time (450-hour)	Converts to Minimum Time	No change	Cannot be filled
Minimum-Time (300-hour)	No change	No change	Cannot be filled

Slot Correction

A slot correction is necessary when a program needs to increase or decrease the number of slots awarded in the grant. The number of MSYs specified in the grant contract will be altered by this request. A slot correction can only be processed by the Serve DC AmeriCorps Program Officer.   Once approved, the request will be sent to the CNCS grants officer. The program must contact the AmeriCorps Program Officer if such a correction needs to be made.

Performance Measures

Serve DC requires that all AmeriCorps State subgrantees track their progress toward performance measures as indicated in their AmeriCorps applications through ongoing data collection. Performance measures report on program outputs, intermediate outcomes, and end outcomes. In an effort to streamline and codify all data of AmeriCorps State subgrantees, Serve DC developed two performance measures in the areas of participant development and volunteer mobilization.   Subgrantees are also required to choose one nation performance measure. The results of the data collected through periodic progress reports will establish concrete results of national service in District of Columbia communities.

- ▪ OUTPUTS: Outputs can be the count of beneficiaries receiving service, amount of service delivered, or number of participants conducting service.
- ▪ INTERMEDIATE OUTCOMES: Intermediate outcomes are the changes or benefits experienced by your service recipients within the timeframe of your program.
- ▪ END OUTCOMES: The end outcomes are the positive changes that your project ultimately hopes to achieve for participants and beneficiaries.

For information on tracking performance measures see CNCS Performance Measure Instructions
http://www.nationalservice.gov/sites/default/files/documents/ACSN_PM_Instructions_2015_NOFO_1.pdf

Performance Measures Modification

Modification requests must be made in writing and sent to the Serve DC AmeriCorps Program Officer and approved before reporting on the modified objectives in a Progress Report. Before you go through the process of modifying your performance measures, please consult with the Serve DC AmeriCorps Program Officer. Refer to the AmeriCorps grant agreement and exhibits for additional information. Please note that the request must be sent before the end of the 3rd quarter of the program year. An email is acceptable. Please note that even if a performance measure modification is approved, the performance measure and its targets will not be changed in the eGrants or OnCorps reporting system; the program will note the change in the narrative section of the performance measure in OnCorps.

DC State Performance Measure: Volunteer Generation

AmeriCorps State Members will recruit and train volunteers for one-time and ongoing service projects in their communities as documented by organization project attendance records, project evaluation materials, and project registration materials. In an effort to report uniformly and codify our state results, Serve DC- has

developed a performance measure to track volunteer generation. All programs **must** submit Volunteer Generation Reports using the OnCorps Reporting System. Additionally, programs must submit monthly volunteer generation reports to the AmeriCorps Program Officer in the form of an email.

DC State Performance Measure: Member Development

The Member Development Performance Measure captures the number of training hours for AmeriCorps State members as well as the types of training members receive to successfully complete their service and prepare for "Life after AmeriCorps."

AmeriCorps Program Reporting

Subgrantees are expected to meet all reporting deadlines established by Serve DC. Due dates for all reports are listed in Contract Addendum #1 of the AmeriCorps grant agreement. Reports received after the due date and without an approved extension may delay the subgrantee's next funding reimbursement. A subgrantee must request an extension at least 24-hours before the report is due. A subgrantee's ability to meet due dates is evaluated by program staff as a part of the monitoring process.

Quarterly Progress Reports

Programs submit quarterly reports which address accomplishments and outcomes as they occur. Reports are due every three months (e.g. a report for April, May, and June is to be submitted in July). Due dates are specified in each subgrantee's Contract Addendum #1.

Periodic Expense Report (PER)

PERs are submitted on a monthly basis with the subgrantee's Request for Reimbursement. PERs and the subgrantee's requests are due the last day of the month following the report month.

Service Host Site Management

In order to ensure a positive experience for members at the service site, it is critical to establish a clear understanding of expectations for the member role and responsibilities. Serve DC monitors subgrantees to ensure that proper host site management is taking place by evaluating the following:

- Established Memorandum of Understanding/Partnership Agreements between subgrantees and service host sites
- Verification that subcontractors/Service Host Sites follow AmeriCorps and other federal policies. (Subgrantee should be able to provide policies and procedures of service sites)
- Established protocol for subgrantees to monitor service sites (schedule, tool, feedback form, follow up, etc.) and verification that monitoring is taking place at the service sites

Resources for working with host sites:
http://encorps.nationalserviceresources.org/working_with_host_sites.php

Serve DC Monitoring and Evaluation

A monitoring site visit is an on-site assessment by Serve DC staff to determine if the program is in compliance with the Grant Award Agreement, AmeriCorps Grant Provisions, and Federal Regulations. The monitoring visit will cover all areas of program operation. Source documentation to be reviewed may include: data collection sheets, member files, financial documents, and any other documents that will substantiate data reported in progress reports and/or financial reports. Achievement of program objectives will be verified by examining source data on several separate objectives.

Monitoring Site Visit

Each year, Serve DC staff prepares a site visit schedule as a part of the risk-based monitoring policy.

1 month prior to the visit

The program will be contacted via email or letter to arrange a mutually convenient date for the visit. Both program and financial staff should be consulted in arranging the date for the visit.

2-3 weeks prior to the visit

Written confirmation of the site visit date and requirements will be emailed to the program director and the financial staff contact. Confirmation will include a reminder of the length of time the visit is expected to take and what items need to be present during the visit.

1-5 days prior to the site visit

Serve DC staff will:

- Send a brief agenda for the visit.

- Review OnCorps and e-grants reports, rosters, member forms, etc.

- Identify most recent audit report and management letter on file and note any material findings or questioned costs related to the program.

- Identify all recent site visit reports and associated follow-up for the program and note any identified findings/concerns and the associated continuous improvement/corrective action measures.

- Survey all Serve DC staff to determine if there are any outstanding issues other than those identified above.

- Based on previously discovered issues, reports and any risk factors or specific monitoring plans identified in individual project risk assessments, identify all criteria within the following table to be monitored.

On the day of the visit

Serve DC staff will:

- Follow the agenda and make every attempt to stay on schedule.

- Document the review process – keep all notes and copies, identify which files were reviewed, etc. For any findings, document by provision number the discussion, testing or other event leading to the finding AND

document that the finding was discussed with appropriate staff both at the time it was noted and during the exit interview.

- Obtain copies of all relevant items requested.

Following the visit

- Within 2-4 weeks (or when all immediate follow-up requested items have been received), Serve DC will complete the formal written site visit report.

- The site visit report will be sent to the program director. The report will note any concerns or findings identified at the site visit. The program must return the Site Visit Summary Acknowledgement which acknowledges they received the formal site visit report.

Follow-up

- Programs are required to respond to the site visit summary within 30 business days.

- If the program has significant findings, the AmeriCorps Program Officer will conduct a follow up visit.

- The AmeriCorps Program Officer will then close-out the site visit with a close-out letter.

Mid-Year and End-of-Year Member Online Survey

In order to assess and obtain information about the experiences of members in AmeriCorps State programs, Serve DC will distribute an online survey for members to complete and provide feedback twice a year (mid-year and end-of-year). These surveys inform Serve DC's monitoring and technical assistance efforts with AmeriCorps State programs.

Personnel Policies and Procedures

The following policies and procedures are a requirement of the AmeriCorps grants. These policies apply to all grant funded staff and members. During site visits Serve DC staff will check subgrantee personnel policies and procedures to ensure they are included.

Drug-Free Workplace Certification

Through the enactment of Senate Bill 1120 (Chapter 1170, Statutes of 1990), the Drug-Free Workplace Act of 1990 ("the Act") was established, which requires subgrantees to assure Serve DC that they will comply with the requirements of Government code Sections 8350-8357. Serve DC is required by law to obtain written certification of compliance. The Drug-free Workplace Certification must be signed by the designated individuals authorized to sign the grant award and will become part of Serve DC grant agreement.

Reference: http://www.nationalservice.gov/sites/default/files/resource/drugfreepolicy.pdf

Grievance Procedures

AmeriCorps State programs must develop and distribute CNCS-approved grievance procedures to all AmeriCorps members and staff supported by the AmeriCorps State grant. It is imperative that programs be able to demonstrate that they have grievance procedures that resolve disputes concerning member's suspension, dismissal, service evaluation or proposed service assignments, and that, as a participant of the program, he/she may file a grievance in accordance with the program's approved grievance policy.

Grievance Procedures should include (at a minimum):

- Grievance must be filed within one calendar year of the alleged occurrence (except in cases of fraud or criminal activity).

- Within 30 days of the filing of a grievance, a hearing must be held.

- Within 60 days of the filing of a grievance, a decision must be made.

- If no decision is made within 60 days of the grievance filing, or if the decision is adverse to the aggrieved party, the aggrieved party may request binding arbitration. Binding arbitration must be held within 45 days of request.

- If the parties cannot agree on an arbitrator within 15 calendar days after receiving a request from one of the grievance parties, the CNCS Chief Executive Officer 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 Chief Executive Officer, the proceeding must occur no later than 30 calendar days after the arbitrator's appointment.

Non-Discrimination Policy

The subgrantee must include information on civil rights requirements, complaint procedures and the rights of beneficiaries in member service agreements, handbooks, manuals, pamphlets, and post in prominent locations, as appropriate. The grantee must also notify the public in recruitment material and application forms that it operates its program or activity subject to the nondiscrimination requirements. Sample language, in bold print, is "**This program is available to all, without regard to race, color, national origin, disability, age, sex, political affiliation, or, in most instances, religion.**" Where a significant portion of the population eligible to be served needs services or information in a language other than English, the grantee shall take reasonable steps to provide written material of the type ordinarily available to the public in appropriate languages.[24]

Non-Supplantation, Non-Duplication and Non-Displacement

Non-Supplantation

CNCS assistance may not be used to replace State and local public funds that had been used to support programs of the type eligible to receive CNCS support. For any given program, this condition will be satisfied if the aggregate non-Federal public expenditure for that program in the fiscal year that support is to be provided is not less than the previous fiscal year.

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[24] AmeriCorps Provision 2014 V.F.1

<u>Non-Duplication</u>

Assistance provided under the national service laws shall be used only for a program that does not duplicate, and is in addition to, an activity otherwise available in the locality of such program.

Private Nonprofit Entity—Assistance made available under the national service laws shall not be provided to a private nonprofit entity to conduct activities that are the same or substantially equivalent to activities provided by a State or local government agency that such entity resides unless non-displacement requirements are met.

<u>Non-Displacement</u>

An employer shall not displace an employee, position, or volunteer (other than a participant under the national service laws), including partial displacement such as reduction in hours, wages, or employment benefits, as a result of the use by such employer of a participant in a program receiving assistance under the national service laws.[25]

Prohibited Activities Restrictions

The subgrantee ensures that grant-funded staff is complaint with prohibited activities restrictions.

Reasonable Accommodation

The grantee ensures the provision of reasonable accommodation to qualified individuals.

General Liability Coverage

The subgrantee is responsible for ensuring adequate general liability coverage for the organization, employees and members, including coverage of members engaged in on- and off-site project activities.

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[25] 42 U.S. 12584A

AmeriCorps Financial Management

Financial Management is defined as the planning, directing, monitoring, organizing, and controlling of the monetary resources of an organization. Solid financial management in your organization means that all the required financial systems, policies, procedures, and separation of duties are in place and followed. Additionally, consistent checks and balances are established and followed.

The organization's accounting system should record financial transactions by budget line item and program year and should distinguish between federal and non-federal funds. You should also regularly reconcile the budget to actual expenditures. You must retain thorough documentation that supports all expenditures and in-kind matching funds including time and activity reports that support staff time spent on the grant.   Every organization should segregate financial responsibilities and should maintain written policies and procedures. Since the program director is responsible for the overall administration of the program, he or she should take an active role in understanding and monitoring the financial systems.

The Office of Management and Budget (OMB) Uniform Administrative Requirements published with the Corporation's regulations (45 CFR 2541 through 2543) are the policies that govern and guide you through the successful implementation of the grant and all necessary management systems.

Federal funds are subject to certain requirements; it is important to be aware of these requirements and follow them. As the Program Director or the Executive Director charged with executing the AmeriCorps program, you must have an adequate understanding of the grant provisions, terms and conditions and the Uniform Administrative Requirements to ensure that your program is in compliance.

An AmeriCorps budget is the financial blueprint that allows your AmeriCorps program to operate. It outlines the dollars necessary to address the community's identified needs using community service by AmeriCorps members.

Itemized Receipts

All subgrantee organizations must submit itemized receipts for purchases made in support of reimbursable costs. An itemized receipt must include the merchant or provider name, service received or item purchased, date of service and amount of expense.   Cancelled checks, handwritten receipts, credit/debit card transaction receipts or previous balance receipts cannot be used to verify an expense. Serve DC will not accept receipts which are not itemized.

Record Retention

The retention period of a document is an aspect of records management. It represents the period of time a document should be kept or "retained" both electronically and in paper format. At the termination of the retention period, the document is usually destroyed.

Subgrantees are required to retain records for three years after the submission of the final FFR. In the case of an audit starting prior to the expiration of the 3-year period, the records must be retained until the audit findings have been resolved and final action taken.

Note: Subgrantees must document the staff hours through time and attendance records. There must be individual time and attendance records for all staff who will be attributed to the grant (in whole or partial) that allow you to identify time allocated towards the grant versus other unrelated projects. *See Appendix 11.*

Disposal of Records

Programs must make responsible efforts to protect the confidentiality of disposed program records in such a way as to protect the identity and privacy of program participants.

Grant Award Conditions

The notification of sub grant award and its provisions contain details and specifics governing the management of the AmeriCorps grant. Your organization's financial officer and accountant should be familiar with the more detailed financial and management requirements contained within CNCS regulations, the grant and/or application, and the Uniform Administrative Requirements

In order to effectively manage and implement your program, program directors need to be familiar with the principal requirements applicable to the AmeriCorps program, such as member recruitment, training, prohibitions on lobbying, terms of service, minimum hours, etc. In addition, you should be familiar with the special limitations on the use of funds that apply to AmeriCorps, such as the 5% limitation on federal funding utilized for administrative costs and the prohibition on using budgeted member allowances and benefit funds for other unrelated program activities and expenses. All of these requirements have been recently revised and are detailed in the AmeriCorps provisions within your grant.

Serve DC may withhold grant funds and/or disallow expenditures when a program fails to comply with any terms or conditions of the grant award and/or federal regulations. This may include, but is not limited to, the following:

- Failure to submit the required reimbursement claims in a timely manner;
- Failure to submit the required progress reports in a timely manner;
- Failure to resolve interim or final audit exception on past or current grants in a timely manner;
- Inadequate maintenance of accounting records;
- Failure to submit proof of liability coverage in a timely manner;
- Failure to cooperate with or admit Serve DC staff or representatives (e.g., audit team) to review programmatic and fiscal records.

Serve DC reserves the right to reduce or terminate grant funds for reasons that may include, but are not limited to, the following:

- Failure by the program to comply with any of the terms and conditions of the grant agreement;

- Reduction or elimination of Federal funds appropriated for the purposes of the grant award by the United States Government during the term of the grant agreement.

Grant Continuation

Programs that have been previously funded by Serve DC will be reviewed for compliance, including financial management, progress and annual reports, monitoring results, audit reports, and any other relevant documentation or information. Failure to comply with terms or conditions of the grant agreement may result in the denial of future funding.

Termination of Grant

A determination of non-compliance will jeopardize eligibility for continued grant funding. Each grant award may be subject to suspension of payment or termination of the grant or both, and the grantee may be subject to debarment, in accordance with the requirements of Section 8356 of the National and Community Service Act, if Serve DC determines that any of the following has occurred:

- The subgrantee has made a false certification under Section 8355.

- The subgrantee violates the certification by failing to carry out requirements of subdivisions (a) to (c), inclusive, of Section 8355.

The DC Office of Contracting and Procurement shall establish and maintain a list of individuals and organizations whose contracts or grants have been canceled due to failure to comply with these provisions. Serve DC shall immediately notify the DC Office of Contracting and Procurement of any individual or organization that has an award canceled on the basis of violation of these provisions.

Supplanting and Supplementing

Funding awarded by Serve DC must be utilized to supplement existing funds for programmatic activities and not to replace those funds which have been appropriated for the same purpose. **Supplanting is strictly prohibited.**

The grant and/or awarded contract entered into with Serve DC is subject to any applicable restrictions, limitations, or conditions enacted by the District of Columbia Government and/or the United States Government subsequent to execution of the grant award.

Debarment/Suspension

It is the policy of Serve DC to conduct business only with responsible parties. Applications must certify that they will adhere to the guidelines and standards included in Federal Executive Order 12549, Debarment and Suspension. By signing the Certification of Assurance of Compliance Form, the applicant certifies to that effect.

Budget

The following are the guidelines provided by CNCS AmeriCorps Provisions regarding budget changes.

Budget Terminology

<u>Line Item</u>: A budget item within a section and/or category in an approved budget.

<u>Calculation</u>*:* The breakdown of each line item cost. It outlines the steps you took to arrive at the line item amount. Calculations should be presented in an equation format, identifying the number of persons/units involved, per person/unit cost, etc.

Budget Modification

A budget modification is defined as any change to the approved budget during the project period of performance which can include a shift of funding from one budget category to another, a shift of funds from one section to another or a reduction of the Grantee Share (match) commitments. As with an approved budget, a budget modification must provide a full explanation (budget narrative) of associated costs including their purpose, justification and the basis of the calculations. All budget modification requests must include calculations where appropriate.

One budget modification per budget period of performance will be allowed, however there are exceptions which require prior approval by Serve DC:

- Personnel Changes
    1. Increase/Decrease in hours worked
    2. Elimination/Change in job function
    3. Addition of a new position
- Adjustment of 10% or More
    1. Reallocation of funds between line items
    2. Moving funds from one budget category to another budget category

<u>Modifications without CNCS or Serve DC approval</u>

A program is allowed to modify its budget without Serve DC approval if the AmeriCorps Program Officer is notified of the budget modification in writing and if the budget modification meets the following criteria:

- Does not change the total federal (CNCS) Share or Grantee Share
- Modifies the Federal (CNCS) Share and/or Grantee Share by less than 10% cumulate

The subgrantee must ensure in its letter of request to the AmeriCorps Program Officer that the level of service provided by the subgrantee will not be reduced or compromised by the budget modification. Please see AmeriCorps grant agreement for more information.

Modifications Barring Serve DC Approval

The subgrantee is allowed to modify its budget with Serve DC approval if a written request is submitted to Serve DC AmeriCorps Program Officer and if the budget modification:

- Does not change the total federal (CNCS) Share or Grantee Share
- Modifies the Federal (CNCS) Share or Grantee Share by more than 10%

Modifications Barring Serve DC and CNCS Approval

- Changes the total federal (CNCS) Share or Grantee Share
- Modifies the Federal (CNCS) Share or Grantee Share by more than 10%
- Purchases of equipment over $5,000 using Grant funds, unless specified in the approved application budget

The subgrantee must ensure in their letter of request to Serve DC that the level of service provided will not be reduced or compromised by the budget modification. Detailed information must also be reflected in the OnCorps budget modification. The subgrantee will then receive a letter or email from the AmeriCorps Program Officer indicating that the budget modification was approved or rejected. All modifications will be approved or rejected by Serve DC.

The sub grantee must also submit a written request through the AmeriCorps Program Officer for approval of reductions in the Federal (CNCS) or Grantee Shares of the Grantee's budget. Per Provision 15(c), "The (CNCS) Grants Officer will execute written amendments or changes to the Grant, and Grantees should not assume approvals have been granted unless documentation from the Grants Office has been received."

Costs

Administrative /Indirect Cost

An administrative cost is defined as an expense incurred in controlling and directing an organization, but not directly identifiable with financing, marketing, or production operations. The salaries of senior executives and costs of general services (such as accounting, contracting, and industrial relations) fall under this heading. Administrative costs are related to the organization as a whole as opposed to expenses related to individual departments within organizations that receive CNCS funding.

Examples of Administrative Costs include:

- General Liability Insurance
- Accounting and Audit Services
- Internet, Landline and Mobile Telephone Services
- Salaries of employees that are not involved in the production of goods or supply of services
- Disbursing Services
- Rent/Leasing
- Utilities

An indirect cost is defined as an expense (such as for advertising, computing, maintenance, security, supervision) incurred in joint usage and, therefore, difficult to assign to or identify with a specific cost object or cost center

(department, function, program). Indirect costs are usually constant for a wide range of output, and are grouped under fixed costs.

Examples of Indirect Costs include:

- Equipment rental
- Fuel
- Maintenance
- Security
- Apportion of sales cost
- Business travel expenditure

An administrative cost can be classified as a direct or indirect cost, however administrative cost limits are based on a percent of the total grant award. Indirect costs rates are a percent of a specific direct cost base. The 1993 National and Community Service Act imposed a cap on all administrative costs equal to 5.26% of all funds expended under the sub grant. Serve DC withholds 1.05% of the allowed 5.26% leaving programs 4.21% of administrative expenses. Your agreement provides more information on the 1.05% Commission administrative fee.

In order to charge the fixed administrative rate of 4.21% the subgrantee match for administrative costs may not be in excess of 10% of all direct cost expenditures. These rates may be used without supporting documentation and are in lieu of an indirect cost rate. The 4.21% administrative is approved on a case-by-case basis by the CNCS.

If a subgrantee wants to claim that it paid administrative costs in excess of 10%, the subgrantee must have an approved negotiated indirect cost rate. The subgrantee must have an approved federally negotiated indirect rate cost agreement. Where appropriate, CNCS will establish an indirect cost rate that may be used for this and other Federal awards.

If subgrantees have an approved indirect cost rate, that rate will constitute documentation of the grantee's administrative costs including the 5.26% maximum payable by the CNCS and the grantee match of administrative costs. To be allowable under an award, costs must be consistent with policies and procedures that apply uniformly to federally financed and other programmatic activities of the organization. Furthermore, the costs must be afforded consistent treatment in both federally financed and other activities as well as between activities supported by different sources of federal funds.

Program/Direct Cost

Program or direct costs are those costs that are directly related to operating the program, such as:

- Member living allowance and support costs
- Uniforms (only clothing with the AmeriCorps logo can be purchased using CNCS funds)
- Training
- Supplies

- Travel
- Staff costs for those staff who directly support the program or project; coordinate and facilitate program and project activities and staff who review, disseminate and implement CNCS policies relating to a program
- Staff costs for those staff who recruit, train, or supervise volunteers
- Space and facility, and communications costs that primarily support programs, excluding costs that are already covered by an organization's indirect cost rate
- Independent evaluations related specifically to creative methods of quality improvement

Allowable Costs

In general, a cost is allowable if it meets the following criteria:

- It is reasonable and necessary for the performance of the grant award.
- It conforms to the limitations and exclusions within the award as to types or amounts of costs items.
- It is consistent with the fiscal regulations of Serve DC and the DC Government.
- It is documented adequately.

Unallowable Costs

Unallowable costs are defined as those disallowed allocations that do not comply with the grant provisions and OMB requirements; costs that have been charged or matched to the grant can be questioned or disallowed following an audit.

If a program's financial management system is seriously inadequate, Serve DC can suspend funds, terminate the grant, recover funds, or take other legal steps.

Some of most common problems are:

- Inadequate accounting practices
- Poor internal controls
- Inadequate documentation and record-keeping
- Inaccurate financial status reporting
- Undocumented matching contributions, particularly in-kind

Expressly Unallowable Costs

The following is a partial list of some of the most common prohibited expenses; this list is not intended to be all inclusive. Consult with the AmeriCorps Program Officer for the exact requirements and restrictions and any exceptions that may apply.

- Advertising (except for member recruitment) and Public Relations
- Bad Debts
- Contributions and Donations
- Defense of Fraud Proceedings
- Entertainment Costs

- Fines and Penalties
- Food and Beverages with the exception of grant-sponsored conferences, meetings or office functions that are a full-day and directly related to the sub-grant program
- Fundraising
- Alcohol
- Interest and Other Financial Costs
- Losses on Other Contracts
- Real Estate Property and Improvements

Lobbying

Serve DC funds shall not be used for the purposes of lobbying, as required by Section 1352, Title 31 of the U.S. Code, and implemented as 28 CFR, Part 69. This prohibition will be applied to all Federal, District, and Locally-funded grants. Any expenditure or use of funds, grant property, or grant-funded positions for any lobbying activities is unallowable and costs associated with these activities will be disallowed. Using funds for lobbying activities may result in the termination said sub grant award.

Matching Requirements

Programs are responsible for meeting the matching amounts in your negotiated grant award and approved budget. The amounts are based on your proposal and the number of years that your organization has received AmeriCorps funds. The amount of match that your organization proposes may exceed the minimum match required. All programs are required to raise funds from other sources—e.g., non-federal and the private sector.

Subgrantees must meet an overall increasing match requirement:

AmeriCorps Funding Year	1, 2, 3	4	5	6	7	8	9	10+
Grantee Share Requirements	24%	26%	30%	34%	38%	42%	46%	50%

The matching contributions for member support costs (excluding health care) must be in non-federal funds. Per §2541.240 for Matching or cost sharing. (b) *Qualifications and exceptions* (1) *Costs borne by other Federal grant agreements.* Except as provided by Federal statute, a cost sharing or matching requirement may not be met by costs borne by another Federal grant. This prohibition does not apply to income earned by a grantee or sub grantee from a contract awarded under another Federal grant. Unless there is a Federal statute stating that federal funds from another federal agency can be utilized it is prohibited. Please see *Appendix 10* for a *Sample In-kind Donation Form*.

Valid documentation of match includes:

- Grants award documents from other entities
- Timesheets and in-kind vouchers for services
- Equipment and furnishing receipts for donated items
- Leases and other sources documenting the value of donated space
- Copies of receipts given to donors of goods and services

Fundraising

While there are a wide range of activities you may undertake to create a sustainable future for your program, you should keep in mind that certain activities cannot be paid for with federal grant funds. Before making plans, you should review the Uniform Administrative Requirements which outlines costs that can be charged to your grant. For example, Uniform Administrative
Requirements, you cannot charge to your grant the cost of "organized fundraising" or expenses incurred "solely to raise capital or obtain contributions." Staff supported by AmeriCorps grant funds must comply with the OMB limitations while on AmeriCorps time or not charge the time spent on these activities to the AmeriCorps grant. You are also required to keep accurate records regarding the time spent on these and other activities to clearly convey the nature of the activities undertaken.

In general, AmeriCorps members cannot assist their organizations with major fundraising efforts. However, CNCS policy permits some limited activities related to fundraising by AmeriCorps members as long that they do not exceed 10% of their agreed-upon hours.

Program Income

Some grant programs include activities that generate income; conference fees are a common example. Program Income is the amount of income remaining after deducting costs associated with a particular activity or the grant as a whole. Program income must be used to fund the Grantee Share of the match. See the Sub Grant Award Agreement for information regarding the amount of match required by your program. Programs must include program income generated on FFRs submitted to Serve DC.

Audits and Monitoring

Programs may be audited by Serve DC, CNCS or an independent agency at any time to determine whether:

- Financial operations are properly conducted

- Financial reports are fairly presented

- The program has complied with all applicable laws, regulations, and administrative requirements that affect the expenditure of program funds

Audit Requirements

Uniform Administrative Requirements Subpart F applies to all grantees of Federal Funds. Some of the more significant points contained in the revised new subpart F, which is effective for fiscal years ending after December 26, 2014, are:

- An increase in the single audit threshold from $500,000 to $750,000. Only non-profits organizations and state and local governments that expend federal of $750,000 or more in a year must be audited.

- If an entity expends less than $750,000 in a fiscal year it will simply be required to make records available for review or audit by the federal awarding agency, the pass-thru agency and the U.S. Government Accountability Office.

- The single audit must be completed and submitted in machine-readable format to the Federal Audit Clearinghouse either 30 days after receiving the auditor's report, or nine months after the end of the nonprofit's fiscal year, whichever comes earlier.

- The single audit also must be submitted to any pass-through entity, if applicable, and

- Copies of the audit report must be made available to the public.

Audit Reports

All Grantees of federally funded programs must submit the most recent audit reports to Serve DC within 30 days of completion. Programs must follow up and correct identified weaknesses and findings. Programs that sub-contract with other agencies to administer programs and provide $750,000 or more in Federal funds must have a single audit submittal of an audit report from the sub-contractor.

Serve DC will issue a management decision and initiate a corrective action on audit findings within 30 days after the receipt of the subgrantee's audit report and ensure that the sub grantee's audit report takes appropriate and timely corrective action (*See Appendix 12*). The management decision shall clearly state whether or not the audit finding is sustained, the reasons for the decision, and the expected action to repay disallowed costs, make financial adjustments, or take other action.

If the subgrantee has not completed the corrective action, a timetable for follow-up will be given by Serve DC. Prior to issuing the management decision, Serve DC may request additional information or documentation from the grantee, including a request for auditor assurance related to the documentation, as a way of mitigating disallowed costs. The management decision will describe any appeal process available to the grantee.

Evaluation

Independent (External) vs. Internal Evaluation

All AmeriCorps State subgrantees that receive an average annual CNCS grant of $500,000 or more must conduct an independent evaluation. An independent evaluation uses an external evaluator who has no formal or personal relationship with, or stake in the administration, management, or finances of the grantee or of the program to be evaluated. AmeriCorps funds can be used for an independent evaluator if it was approved as part of the grant.

All other AmeriCorps State grantees must conduct an internal evaluation. An internal evaluation is designed and conducted by qualified program staff or other stakeholders, such as, board members, partners, or volunteer affiliates.

Please note that the $500,000 threshold represents Corporation funding, not total budget with match. The $500,000 threshold is calculated by averaging your Corporation grant over the last three years you have

received Corporation funding, at the time you re-compete. For these subgrantees, participation in national or state-wide evaluation studies also satisfies the requirement.

All evaluations must cover at least one year of Corporation-funded service activity.

See the chart below for more detail on Commission- or Corporation-sponsored statewide and national evaluation requirements:

If you are a:	You will submit an:
State formula grantee with an average annual CNCS grant under $500,000	Internal Evaluation
State competitive grantee with an average annual CNCS grant under $500,000	Internal Evaluation
State formula grantee with an average annual CNCS grant of $500,000 or more	Independent (External) Evaluation
State competitive grantee with an average annual CNCS grant of $500,000 or more	Independent (External) Evaluation

AmeriCorps State programs must submit results of the internal or independent evaluation within thirty days from completion to the AmeriCorps Program Officer.

Monitoring

A monitoring site visit is an on-site assessment by Serve DC staff to determine if the program is in compliance with the Sub Grant Award Agreement, Grant Provisions and the Federal Regulations. The Commission's goal in monitoring is to support programs and help achieve their goals.

Scope of Monitoring

The monitoring visits will cover all areas of program operations. Documentation to be reviewed may include, but is not limited to: data collection sheets, policies and procedures, financial information, and any other source documents that will substantiate data reported in progress and fiscal reports. A site visit document checklist of program objectives will be verified by examining source data on several separate objectives.

Liability Coverage

Programs must have sufficient liability insurance to protect the organization, employees and participants. Participants who are engaged in both on- and off-site program activities must be covered. Programs decide how much liability coverage is sufficient, given the specific risk factors the program presents. General liability insurance is an administrative cost which can be charged against the grant (subject to the grant's administrative cost limit) or include in the program's match. If the cost of the member liability insurance is included in the approved budget, it may be charged as a direct program cost.

For additional information on insurance issues, refer to "Insurance Basics for Community Service Program," a publication by the Nonprofit Risk Management Center, (202) 785-3891. Serve DC has several publications from the Nonprofit Risk Management Center in the DC Resource library including "Benefits & Labor Issues Under the National and Community Service Act" and Special Legal Issues for AmeriCorps USA.

Taxes

Most programs are required to pay FICA. Under federal law, the FICA payment rate is 15.3% of the living allowance. Half (7.65%) is paid by the program and half is deducted from the member living allowance FICA payments to cover Social Security and Medicare benefits.

Withholding Income Taxes

Under federal taxes, ordinary income tax rules apply to member benefits. A living allowance is taxable as "compensation for services" and generally is subject to federal withholding. Room and board also may count as income subject to withholding, even though the members do not receive cash. Low-income members may be able to claim an exception from withholding if (1) they had no tax liability in the previous year, and (2) they expect to have no tax liability in the current year. State income tax withholding laws also apply.

Like all personal income taxes, taxes on the living allowance are the responsibility of the individual member. Members receiving a stipend must complete a W-4 form at the start of the term of service. At end of the tax year, programs must provide members with a W-2 form.

Reimbursements Process

Two Easy Steps to Reimbursements

1. Complete the monthly Periodic Expense Report (PER) in the OnCorps Reporting System. PERs in OnCorps should be for a one month period only, beginning with the 1st day of the month and ending on the last day of the month. Reimbursement requests will not be processed without the appropriate documentation. Required documentation includes copies of general ledger print outs and receipts/invoices to substantiate reimbursements. **Programs must clearly demonstrate where all receipts align with line items by providing a spreadsheet with the reimbursement package).**

2. Complete, sign and submit the Grantee Request for Funds (GRF) form via US mail or hand delivery (use the form created in MS Excel provided after the receipt of a completed grant agreement). Mailed copies must be postmarked by the due date (the last day of the month following the expenditures). For example, May reimbursements are submitted on or before June 30.

Each request will be checked and approved based upon the completion of the Periodic Report located in OnCorps.

The PER and reimbursement request form will be reviewed for the following:

- Grantee request for funds line 1 (program expenditures to date) does not exceed the CNCS share of year-to-date expenditures reported in OnCorps.

- No lines are below zero (0) in expense report or in OnCorps.

- No negative amounts have been entered in either the CNCS or Grantee share.

- Required match is being met.

- Reporting dates in OnCorps correspond to one month period, starting with the month and ending with the last day of the month.

Note: District of Columbia Government standard practice is to issue a check within 30 days of receipt of the reimbursement request.