

## **CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS**

### **AmeriCorps Seniors Questions**

*Last update 9/29/20*

AmeriCorps is closely monitoring the latest developments related to COVID-19. As America responds to the COVID-19 pandemic, you may have concerns about the potential impacts on your program. The below FAQs address questions posed by the outbreak. Check back as they are updated regularly.

*These FAQs do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. You should refer to AmeriCorps' statute and regulations for applicable requirements.*

### **I am an AmeriCorps Seniors volunteer with questions about my service/benefits, who should I contact?**

AmeriCorps Seniors volunteers with questions can review the FAQs below or contact their program supervisor.

#### **1. What precautions are AmeriCorps and AmeriCorps Seniors taking regarding Coronavirus (COVID-19)?**

AmeriCorps is closely monitoring information and recommendations provided by the U.S. Centers for Disease Control (CDC) related to the COVID-19. As this is an evolving situation, the information and guidelines will continue to develop as conditions change. To help address general concerns, AmeriCorps has released agency-wide FAQs that can be [found here](#).

**[updated 3/13]**

#### **2. Can I mail my volunteers gift cards as a form of recognition?**

Yes. Grantees may issue a gift cards to SCP, FGP, and RSVP volunteers as an allowable form of recognition. See 45 CFR 2551.46(e), 45 CFR 2552.46(e), and 45 CFR 2553.43(c). However, you must use a feasible mailing delivery service to help safeguard and ensure that the gift card is delivered to the intended volunteer recipient. Simply mailing a gift card to the intended recipient is not an acceptable means of delivery because it does not provide reasonable certainty that you will receive a written acknowledgment of receipt from the intended recipient.

Please be mindful that giving gift cards as a form of recognition must be done in accordance with sound business practices, which should include written proof that the intended volunteer recipient received the gift card. During this time of social distancing, we strongly encourage



programs to explore effective ways that you can acquire written proof of receipt (e.g., signatures) from the intended AmeriCorps Seniors volunteer that they received the gift card. While not exhaustive, some examples of potential acceptable methods of documentation of receipt are: a certified mail receipt (check cost of certified mail); an email confirmation from the intended volunteer recipient that they received the mail delivery; or provide a signed confirmation letter with a pre-stamped addressed envelope that can be mailed back to the project. **[updated 4/2]**

### **3. UPDATE: COVID-19 is impacting our organization's ability to perform basic activities such as producing required progress reports. How will this affect my upcoming Performance Progress Report (PPR)?**

AmeriCorps Seniors is extending the due date for the upcoming annual Performance Progress Report (PPR) by 30 days due to COVID-19. The PPR is now due May 30, 2020. There is no need to request an extension as it will automatically be reflected in eGrants. This extension is made under the authority of Administrative Relief Exception No. 10, as provided in OMB's March 19, 2020, memorandum, [Memorandum M-20-17](#), which allows federal grantees affected by COVID-19 to delay the submission of financial, performance, or other reports up to three months beyond the normal due date.

Here are some tips for completing the PPR. Grantees are still required to report on progress toward meeting approved performance targets. Please follow Appendix B: Performance Measure Instructions when reporting your outputs and outcome actuals. We know that state and local actions implemented to reduce COVID-19 may impact your organization's ability to gain access to data due to closures of partner universities, schools, and county offices. Please continue to use your best judgement to report on outputs and outcomes achieved prior to COVID-19 related closures. Grantees or sponsors should identify the impact of COVID-19 on their operations within the relevant narratives section of the progress report. This includes challenges that COVID-19 has had on operations, partnership/collaboration development, and non-federal share development. You should also include a summary of any challenges faced for each Performance Measure in the Grantee Note associated with each Performance Measure. Finally, AmeriCorps is also interested in learning more about the tremendous work that AmeriCorps Seniors project sponsors are doing to address the needs of COVID-19 within their community.

Please rest assured that grantees' inability to meet targets during this unprecedented time will not necessitate a performance improvement plan. Additionally, AmeriCorps will not take any action that will result in funding reduction, denial of funding, or termination of grants as a result of unmet targets due to the COVID-19 pandemic. **[updated 3/30]**



#### **4. COVID-19 is impacting my ability to meet match requirements. Will AmeriCorps provide relief regarding this requirement?**

AmeriCorps is waiving all match requirements for all Senior Companion, Foster Grandparent, and RSVP grantees for FY2019 and FY2020. AmeriCorps Seniors is utilizing regulatory authorities set forth in 45 CFR §2551.92(b)(2) (Senior Companion Program), 45 CFR §2552.92(b)(2) (Foster Grandparent Program), and 45 CFR §2553.72(b)(2) (RSVP), which provides AmeriCorps the legal authority to grant exceptions, under certain specific circumstances, to the match requirements. AmeriCorps will expect grantees to document this exception/flexibility and follow all applicable record retention requirements through a memo to the file, instructions can be found in FAQ #3: "What does a Memo to File need to include?" **[updated 3/27]**

#### **5. What does a "Memo to File" need to include?**

AmeriCorps' Office of Monitoring recognizes that due to COVID-19, grant recipients may experience challenges related to documenting grant program activities and expenditures changes due to COVID-19. In these occurrences, grant recipients are encouraged to include a memo to the file that clearly describes the compliance limitations related to documentation, including applicable dates and references to [OMB Memo M-20-17](#) or Agency specific guidance (i.e. [FAQs](#)) that support the grant recipient's approach to documentation during this period. To assist in development of the memo to file, AmeriCorps recommends that the following details are provided in your memo to the file, if applicable:

- Information, if available, from the sponsoring agency regarding restrictions of program operations. Include specific dates.
- Information regarding any local government orders, such as shelter in place, stay-at-home, or non-essential business closures. Include specific dates or local orders.
- Statement regarding what policies or procedures have been temporarily modified and a description of the changes.
  - For example, a statement may address that AmeriCorps Seniors FGP/SCP volunteer timesheets were unable to be signed by each volunteer, due to the fact that local COVID-19 orders prohibited volunteers from attending their volunteer stations. Project staff reviewed timesheets, verified the volunteer hours served with the volunteer, and certified the completion and accuracy of timesheets during this period of time.
- Indicate the timeframe for the change in policy or procedure.
- Project Director signature (may be electronic) and date signed.

**[updated 3/27]**

#### **6. Are FGP and SCP volunteers still able to get their meal reimbursements if they are on emergency leave?**

AmeriCorps Seniors programs should follow existing internal policies and procedures when determining if volunteers can still receive meal reimbursements while on leave or while receiving their temporary allowance. **[updated 3/25]**



**7. We have upcoming Memoranda of Understanding (MOUs), letters of agreement, and other documents that need to be signed related to our AmeriCorps Seniors grant. What happens if we are unable to get them completed and signed before the expiration of the current agreement?**

AmeriCorps Seniors encourages the use of electronic signatures. If unable to implement electronic signatures on new upcoming documents due to the impact of COVID-19, AmeriCorps Seniors will extend the due date for those new documents to be signed and executed until Wednesday, June 17, 2020. AmeriCorps Seniors will re-evaluate, before June 17, 2020, whether a further extension will be necessary. Grantees should document their inability to secure signatures due to COVID-19 through a memo to file. **[updated 3/25]**

**8. Project Directors have asked grantees whether they can reduce their full-time status to part-time or change their status to a temporary suspension status due to the impact of COVID-19. Are these status changes allowable?**

Yes, under certain conditions these status changes are allowable. First, a full-time Project Director can reduce their full-time hours to part-time or a temporary suspension status due to the loss of operational capacity due to COVID-19. In accordance with AmeriCorps Seniors regulations (45 CFR §§ 2551.25(c), 2552.25(c), and 2553.25(c), respectively), an SCP, FGP or RSVP sponsor “may negotiate the employment of a part-time project director with AmeriCorps when the sponsor can demonstrate that such an arrangement will not adversely affect the size, scope, or quality of project operations.” Also, grantees may temporarily suspend their Project Directors’ full or part-time status due to the impact of COVID-19. See [OMB Memorandum M-20-17](#).

If you are interested in modifying the Project Director’s full-time status to a part-time status, or to a temporary suspension status arrangement, please send a written request (email is acceptable) to [AmendmentRequest@cns.gov](mailto:AmendmentRequest@cns.gov).

The written request should include: the grant number found on the notice of grant award, a description of the specific changes to the staffing plan, including the time (e.g., hours per week, if any) the individual project director would be scheduled to devote to the project, if applicable the anticipated end date for the reduced hours, if applicable; and any additional changes in specific personnel. The arrangement cannot adversely affect the size, scope, or quality of project operations. Every effort will be made to review your request within two business days. **[updated 4/3]**



**9. If our Project Director or other staff members who are paid through the AmeriCorps Seniors grant want to reduce their work hours (e.g., go from full-time to part-time status) because of COVID-19, or need to take leave because of COVID-19, is it allowable to continue to pay them their salary under the grant?**

Yes, under certain conditions, it is allowable to continue to pay AmeriCorps Seniors grant-funded staff members their hourly pay or salaries under the grant. If a AmeriCorps Seniors grant recipient's policies allows the grantee to continue to charge staff hourly pay or salaries during a period when no work is performed due to unexpected or extraordinary circumstances, then such charges to the AmeriCorps Seniors grant award are allowable through September 30, 2020. The policy must allow the grantee to continue to charge wages and salaries regardless of the funding source, including Federal and non-Federal sources. These pay policies must also be applicable to the grant recipient's entire workforce.

Originally, this pay action was valid for a 90-day period consistent with the March 19, 2020 memorandum issued by the Office of Management and Budget (OMB) that provides federal grant awarding agencies, such as AmeriCorps, the authority to provide short term administrative relief to grant recipients affected by the loss of operational capacity and increase costs due to COVID-19. The 90-day period expired on June 18, 2020. See [OMB Memorandum M-20-26](#).

On June 18, 2020, OMB issued a follow-on memorandum extending AmeriCorps' authority to provide this short-term administrative relief, to September 30, 2020. See [OMB Memorandum M-20-26](#).

As provided in the June 18, 2020 OMB memorandum, AmeriCorps is authorized, through September 30, 2020, to allow grant recipients to continue to charge salaries and benefits to active grant awards consistent with the grant recipient's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources. Please note that under this continued pay flexibility, payroll costs paid with the Paycheck Protection Program (PPP) loans or any other Federal CARES Act programs must not be also charged to current Federal awards as doing so would result in the Federal government's paying for the same expenditures twice.

Please also note that due to the limited funding resources under each federal award to achieve its specific public program goals, AmeriCorps and AmeriCorps Seniors grant recipients must first exhaust other available funding sources to sustain its workforce, and implement necessary steps to save overall operational costs (such as rent renegotiations) during this pandemic period, in order to preserve Federal funds for the ramp-up effort. See [OMB Memorandum M-20-26](#).



AmeriCorps may also evaluate the grantee's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances based on subsequent progress reports and other communications with the grantee.

Finally, as required by 2 CFR § 200.302 Financial Management and 2 CFR § 200.333 Retention Requirement of Records, grant recipients are required to continue to maintain appropriate records and documentation to support the hourly pay or salary charges that it made against the grant. This complies with OMB's cost principle requirements that require grant recipients to maintain appropriate records and cost documentation to substantiate charging hourly pay or salaries or other project activity costs related to the interruption of operations or services. 2 CFR §§ 200.302, 200.333. **[updated 6/26]**

**10. If our Project Director or other staff members who are paid through the AmeriCorps Seniors grant cannot report to work or telework because of COVID-19 (e.g., the project site temporarily shuts down because of COVID-19), is it allowable to continue to pay them their hourly pay or salary under the grant?**

Yes, under certain conditions, it is allowable to continue to pay AmeriCorps Seniors grant-funded staff members their hourly pay or salaries under the grant. If a AmeriCorps Seniors grant recipient's policies allows the grantee to continue to charge staff hourly pay or salaries during a period when no work is performed due to unexpected or extraordinary circumstances, then such charges to the AmeriCorps Seniors grant award are allowable through September 30, 2020. The policy must allow the grantee to continue to charge wages and salaries regardless of the funding source, including Federal and non-Federal sources. These pay policies must also be applicable to the grant recipient's entire workforce.

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**11. My organization does not currently have a pay policy that addresses continuation of pay under unexpected or extraordinary circumstances. May we prepare and implement a policy now?**

Yes. If your grantee organization does not currently have continuation of pay policies that address unexpected or extraordinary circumstances, it is important that you prepare and implement such policies immediately.

Moreover, the policies must provide for continuation of hourly pay or salaries under unexpected or extraordinary circumstances, even when the funding source of an employee's pay is from another source other than the grant, such as a federal funding source. The policy must be applicable to the grant recipient's entire workforce.

If you are updating your organization's continuation of pay policies, or you are preparing new policies now, the policies should include at least:

- The policies are applicable to the entire workforce in your organization;
- The policies' effective dates;
- The policies address continuation of pay for staff members in instances when they are unable to work for reasons beyond their control (e.g., your grantee organization temporarily shuts down operations, nationally declared disaster or emergency); and



- The policy addresses continuation of pay for staff members in instances when they are temporarily unable to work in their hired duty status (e.g., cannot work in a full-time status) due to unexpected or extraordinary circumstances (e.g., due to COVID-19).

**[updated 4/3]**

**12. My organization’s response to COVID-19 may require changes to our budget. What should I do?**

All AmeriCorps Seniors grant recipients must follow the requirements in their “Budgetary Changes” section as prescribed in the terms and conditions in the grant award supporting documents. Please note, if the federal share of a grant is greater than the “Simplified Acquisition Threshold” amount of \$250,000 and the grantee’s cumulative changes exceeds 10% of the total budget, the grantee must request prior approval to submit an amendment. If the change is below 10%, the grantee does not need to seek prior approval. All costs must be allowable, reasonable, and allocable as stated in 2 CFR §§ 200.403 – 200.405. **[updated 3/25]**

**13. Will the Payment Management System (PMS) continue to operate, so that programs continue to request funds as normal?**

The Payment Management System will continue to operate, and programs can expect to continue to request funds as normal. **[update 3/23]**

**14. I have volunteers who are serving through telework, but I am unable to get them to sign their timesheets due to COVID-19.**

We recognize that these are exceptional circumstances and acquiring timesheet signatures may not be feasible, especially in light of the [CDC guidance](#) relating to older Americans, and guidance to numerous states and locales across the country to shelter-in-place. In order to maintain written records that comply with AmeriCorps and OMB recordkeeping requirements, volunteers who serve through telework are still required to submit a record of the hours they have served on a weekly or biweekly basis, and your grantee organization is still required to approve those hours in writing.

If your organization has a policy for validating timesheets when a volunteer or employee is not available to sign their timesheet, you should follow your policy. If you do not have a policy in place, there are alternative ways to create those records. Volunteers who serve through telework may submit alternative written submissions to your organizations noting hours they have served. Rather than using a timesheet, their submissions may be sent, for example, via email to you, or via a note by text or smartphone photo. You may in turn approve each submission by sending a response back to the volunteer with a notation such as “Hours submitted approved.” You must maintain a record of these communications. In addition, AmeriCorps Seniors recommends that you write a “Memo to File” for your records to appropriately document why timesheets were not signed and the process you used to verify



the hours served. This should not impact your ability to pay a volunteer for the hours served during this time. **[updated 3/23]**

**15. We know that volunteers who have accrued service hours or have completed orientation and were scheduled to serve can receive a temporary allowance. What about applicants who have begun or completed the National Service Criminal History Check (NSCHC) process but have not begun orientation?**

As those individuals have not completed orientation or their NSCHC process, they would not be eligible to receive a temporary allowance. **[updated 3/20]**

**16. Can volunteer accumulate sick and vacation leave during the time they are not serving?**

An organization should follow their own internal policies and procedures as it related to sick and vacation leave. **[updated 3/20]**

**17. Will the hours calculated to identify a volunteer's temporary allowance during COVID-19 count towards VSY hours?**

AmeriCorps Seniors recognizes the disruption that COVID-19 may have in regard to Volunteer Service Year (VSY) production. Grantees should follow existing tracking methods. The calculated hours to identify a volunteer's temporary allowance during COVID-19 should be counted as service and be counted toward VSYs. **[updated 3/25]**

**18. What is the impact of COVID-19 on access to national service criminal history check (NSCHC) vendors Truescreen and Fieldprint?**

As of March 18, 2020, agency-contracted national service criminal history check (NSCHC) vendors Fieldprint and Truescreen are operating as normal. However, please note that certain Livescan fingerprint locations may be closed due to business-specific reasons and/or local government requirements. To see which Livescan sites are closed, you may check site availability on [fieldprintcnscs.com/](http://fieldprintcnscs.com/).

AmeriCorps is staying in close communication with Truescreen and Fieldprint and will issue further notice and guidance if closures become nationwide and/or the sources (FBI/state repository/NSOPW) become unable to provide results to grant recipients.

Please direct questions regarding NSCHC vendors or NSCHC access to [CHC@cns.gov](mailto:CHC@cns.gov). **[updated 3/20]**

**19. In the event that AmeriCorps Seniors service locations are closed (e.g., schools, etc.), or the grantee cannot continue its funded service activity because of disruption at one or more service sites due to COVID-19, will AmeriCorps permit service activities that are not included in approved notice of grant agreement, such as food delivery to families under quarantine?**

If a service activity is disrupted due to COVID-19, grant recipients may develop other types of



service activities that are not specifically defined in the grant and should obtain written (email) approval from their Program Officer/Portfolio Manager as soon as practicable.

New activities must not be otherwise prohibited or unallowable (e.g., lobbying). The new approved service activity can begin immediately, and the grant recipient should expect to take steps to amend the grant. In the meantime, the grantee should carefully document all the costs associated with the new service activities. **[updated 3/20]**

**20. Though the service site is still open, I have a volunteer who is concerned about serving. Can a volunteer refuse to serve because they fear contracting COVID-19 but still be paid their stipend?**

The Director of AmeriCorps Seniors has authorized Foster Grandparent (FGP) and Senior Companion (SCP) grantees and sponsors to pay volunteers a temporary allowance if the program or the volunteer or a volunteer's family member is directly impacted by COVID-19. If a project sponsor deems a volunteer is unable to serve due to the impact of COVID-19, then the volunteer should still receive a temporary pay allowance, as appropriate, and follow the steps provided in the guidance issued on March 13, 2020. AmeriCorps Seniors encourages all project sponsors to follow guidelines from their local, state, and federal authorities. **[updated 3/18]**

**21. If the COVID-19 outbreak results in a break in service beyond 120 days, would volunteers need to re-do their National Service Criminal History Checks?**

A break in service means that a person is no longer providing service through or receiving salary from a recipient or subrecipient. Temporary interruption of work or service without termination of employment or expiration of the agreement under which service is being provided is not a break in service. Regarding members, volunteers, or staff suspended or not serving due to COVID-19, such temporary interruption is not a break in service and no new criminal history check needs to be conducted when the members or staff resume service. **[updated 4/3]**

**22. We are experiencing some difficulties securing signatures and, in some cases, timesheets. Many of our volunteer stations closed so quickly there was no time to pick up timesheets or to get them signed. How should we proceed?**

We recognize that these are exceptional circumstances. AmeriCorps Seniors recommends that you write a "Memo to File" for your records to appropriately document why timesheets were not signed. This should not impact your ability to pay a volunteer for the hours served during this time. **[updated 3/18]**



**23. Is it allowable for staff to work at home (telework) if the umbrella sponsor organization where the RSVP program resides does not have a telework policy and/or may not allow telework?**

All organizations should follow internal policies and procedures relating to staff's ability to telework. We encourage all organizations to follow the guidelines of local, state, and federal health authorities. **[updated 3/18]**

**24. We are cancelling our upcoming recognition event that takes up a significant portion of our budget. Will there be some type of guidance on what to do should there be difficulty in expending funds due to COVID-19?**

Due to COVID-19, AmeriCorps Seniors grantees may want to consider other ways to recognize volunteers such as mailing gifts to them or other options instead of in-person events. When thinking about spending federal funds for recognition, grantees should always ensure that funds are reasonable, allocable, and allowable.

We recognize that COVID-19 may also impact expenses. A grantee may have unexpended funds from a previous budget year and use them within the same performance period. The full impact of COVID-19 is not yet known, and AmeriCorps Seniors is monitoring the situation and will address it at the appropriate time. **[updated 3/18]**

**25. If an FGP/SCP project already has a written policy in place for paid administrative leave in emergency situations, are they still required to go through the procedure to request a temporary pay allowance?**

AmeriCorps Seniors is committed to holding volunteers harmless during these exceptional circumstances and should take steps to ensure volunteers receive their stipend allowance, or in lieu of that, a temporary allowance, if they are unable to serve due to COVID-19. **[updated 3/18]**

**26. If a new FGP/SCP volunteer has recently completed orientation to serve, but has not been placed on site yet, are the volunteers eligible for the temporary pay allowance? If so, how would their average amount of hours be calculated?**

The grantee and sponsor may use their own discretion to determine the appropriate number of weekly service hours for each volunteer. For instance, in this circumstance, a sponsor may calculate the appropriate number of hours by looking at the proposed schedule of volunteers who have completed orientation but have not yet started serving. AmeriCorps Seniors grantees and sponsors should be reasonable, fair, and consistent in their methodology for calculating hours, and document how they arrived at the average weekly service hours for each volunteer and ensure that they have documented their decisions. **[updated 3/18]**



**27. I have questions regarding the mandatory training requirements for FGP and SCP volunteers as I am concerned about holding in-person trainings for my volunteers due to the impact of COVID-19.**

Grantees', sponsors', and volunteers' health and safety are our top priority during this global health crisis. We recognize that COVID-19 may impact planned in-person trainings. Project sponsors are encouraged to think broadly and creatively when considering how to structure in-service training that are not in-person during this time. For example, projects might institute virtual trainings or send out articles or recommend an appropriate movie watch list, then ask volunteers to do a brief write-up. Or possibly, conference calls could be scheduled to discuss a topic or have a Q&A session. Please note that per our regulations, each FGP and SCP volunteer must receive a minimum of 20 hours of pre-service orientation and 24 hours of in-service orientation annually. Please refer to your program's [Operations Handbook](#) for more information on training. **[updated 3/12]**

**28. Are stipended volunteers able to receive their stipend if their volunteer station is closed?**

AmeriCorps Seniors recognizes that due to the continued impact of COVID-19, FGP and SCP volunteers may continue to be unable to serve. The Director of AmeriCorps Seniors authorizes FGP and SCP grantees to continue to pay volunteers who are unable to serve a temporary allowance and has outlined the payment process below. While this allowance is separate and distinct from the stipend that is normally paid to FGP and SCP volunteers, the Director of AmeriCorps Seniors authorizes a final extension to this temporary allowance. Extending the allowance to December 31, 2020, provides grantees additional needed time to implement the infrastructure that would allow all volunteers to perform alternative service activities under Alternative Service Plans. The extension also helps preserve the volunteer workforce and minimizes potential service disruptions. Rather than risk the eventual loss of valuable AmeriCorps Seniors volunteers because of their inability to serve in a traditional service environment due to COVID-19, AmeriCorps Seniors leadership has determined that it is in the best interest to AmeriCorps' respective AmeriCorps Seniors programs, as well as to the individual program sponsors and volunteer stations, to extend the temporary pay allowance one final time through December 31, 2020. More guidance information can be [found here](#) on the steps you must take to pay your volunteers an allowance.

The temporary pay allowance shall continue to be paid at the rate of \$3.00 per hour. Grantees shall calculate each individual volunteer's temporary allowance at \$3.00 an hour and multiply this amount with the average weekly service hours for each individual volunteer.

As noted above, the AmeriCorps Seniors Director has extended the temporary pay allowance through December 31, 2020. Grantees are to use this additional time to put in place a plan and structure – i.e. infrastructure, training, electronic equipment – that supports FGP and SCP volunteer service in an alternative manner and complies with each programs' statutory and regulatory requirements. Grantees need to prepare and work to implement return-to-volunteer service plans that promote both the volunteers' safety and the individuals and



communities they serve. We encourage you to begin implementing alternative service activities as soon as possible. The temporary allowance expires December 31, 2020 and no further extensions will be authorized. Grantees should work with their Portfolio Managers and submit plans to ensure that SCP and FGP volunteers have the ability to serve by December 31, 2020.

AmeriCorps Seniors recognizes that volunteer service is going to look different across the country. We continue to promote safe volunteer practices as the well-being of our volunteers is our priority. In August 2020, we provided a framework for reopening AmeriCorps Seniors volunteer service opportunities in the [Pandemic Recovery: The Path forward for AmeriCorps Seniors Programs and Service](#) document. The flexibilities identified within this document have been deemed permissible service activities for AmeriCorps Seniors volunteers during the COVID-19 pandemic. We have also provided a [Resource Tool Kit](#) with general information regarding safe volunteering, preparing your volunteers to serve during COVID-19, and other resources which may help you through these unprecedented times. Please continue to leverage your Program Office/Portfolio Manager for ongoing support.

Through December 31, 2020, in circumstances where a volunteer is able to engage in certain service activities, but their weekly service hours for safe volunteering do not match their average weekly hours the volunteer would normally accrue through service, the grantee may use the temporary pay allowance and pro rate the pay allowance amount to make up the average weekly pay difference. For instance, if a volunteer normally serves 20 hours a week and their service site is closed due to COVID-19, they would receive a temporary allowance reflecting 20 hours. If the Project Sponsor is now open and reallocates the volunteer to serve 5 hours a week in another service activity in response to COVID-19, such as food delivery to families under quarantine or a telephone reassurance program, the volunteer should receive 5 hours of stipend pay, and 15 hours of the temporary pay allowance. The volunteer would still receive 20 hours of pay – the timesheet would need to delineate the number of hours in actual service and the number of hours counted through the temporary pay allowance. A volunteer may not receive more pay than their average weekly temporary pay allowance allotment. In this example, it is not allowable for the volunteer to receive a temporary pay allowance for 20 hours PLUS the 5 hours stipend pay for serving in the additional activity.

**[updated 9/28]**

### **29. How should I determine the appropriate number of weekly service hours for each volunteer?**

The grantee and sponsor may use their own discretion to determine the appropriate number of weekly service hours for each volunteer. AmeriCorps Seniors grantees and sponsors should be reasonable, fair, and consistent in their methodology for calculating hours, demonstrate in writing how they arrived at the average weekly service hours for each volunteer, and ensure that they have documented their decisions. **[updated 3/17]**



**30. If AmeriCorps Seniors volunteers were already on leave, can they still be included in the stipend allowance?**

AmeriCorps Seniors grantees should follow their internal policies and procedures in regard to paying volunteers who are on leave and normally receive a stipend. For instance, a grantee may require volunteers on pre-approved leave to first utilize that leave. Once their approved leave ends, if they are still unable to serve due to COVID-19, then they should receive the temporary pay allowance and should be paid following the process outlined in the guidance issued on March 13. **[updated 3/17]**

**31. If a AmeriCorps Seniors in-service event has been cancelled and the costs has already been expended and cannot be recovered, will these costs be allowable under the grant?**

If any in-service events are cancelled, we recommend that you document that your events were cancelled due to COVID-19 and obtain copies of and document any city, local, and/or state mandates related to the COVID-19, if they exist. **[updated 3/17]**

**32. What should grantees and sponsors do if they are unable to continue administering their AmeriCorps Seniors programs when they are required to keep their office closed for an extended period of time because of COVID-19?**

Each organization shall make its own decision on whether to proceed with administering their program. In such a case, volunteers should still be paid their allowance following the guidance issued on March 13. Grantees and sponsors should follow their own internal existing suspension of operations policy and procedures. AmeriCorps Seniors recommend all project sponsors to follow the guidelines from their local, state, and federal authorities. **[updated 3/20]**

**33. There has been an outbreak of a disease other than COVID-19 (such as influenza) in my community. Can the same guidance allowing payment of volunteer allowances be allowable?**

All guidance issued through the office of the Director of AmeriCorps Seniors is strictly for volunteers, grantees, and sponsors affected by COVID-19. **[updated 3/17]**

**34. Our volunteer sites are trying to minimize the risk of the COVID-19 exposure to the children and staff by suspending any non-essential personnel coming onto their sites until April. To protect their health as well as the health of the children they see while volunteering, should we suspend their volunteering activities for a few weeks?**

All programs should follow applicable local, state, and federal guidance and requirements regarding public gatherings and congregate events by consulting information and guidance from the Centers for Disease Control and other relevant state and local agencies. A list of state and territorial health organizations can be found at the CDC State Health Department Portal. **[updated 3/17]**



**35. I have an upcoming continuation/renewal application due on April 20, 2020. Is AmeriCorps Seniors providing an extension for upcoming funding applications?**

Yes. AmeriCorps Seniors is extending the application deadline for continuations/renewals to April 30, 2020. Please note the deadline in eGrants will not be updated. If any grantee does not believe they will be able to adhere to this deadline, please contact your Program Officer/Portfolio Manager to determine what other flexibilities may be available and what justification will be required. **[updated 4/10]**

**36. We are cancelling our upcoming recognition event due to COVID-19. In order to still provide recognition to our volunteers can we recognize their achievements through other activities such as mailing gifts? Will this be allowable?**

Due to COVID-19, AmeriCorps Seniors grantees can mail gifts to volunteers and should think about ways to provide volunteer recognition other than in-person events. When thinking about spending federal funds for recognition, grantees should always ensure that funds are reasonable, allocable, and allowable. **[updated 3/17]**

**37. Should my organization cancel planned events (i.e. training, recognition, or other special events)?**

Each organization should make their own assessment and decision on whether to proceed with upcoming congregant events by consulting information and guidance from the Centers for Disease Control and other relevant state and local agencies. A list of state and territorial health organizations can be found at the CDC State Health Department Portal. **[updated 3/12]**

**38. Can Senior Companion Program and Foster Grandparent Program volunteers teleserve?**

Teleservice is appropriate when the activity can be meaningfully supervised, and the hours verified independently. It is important for any project that chooses to include an element of teleservice, that the program has a teleservice policy in place to guide volunteers. Further guidance can be found in each [Program's Operations Handbook](#). **[updated 3/12]**

**39. Can AmeriCorps Seniors Grantees and Sponsors ask volunteers if they have traveled to one of the affected areas?**

Yes. Given the ongoing travel advisories and the recommendations of the CDC and other federal agencies regarding travel to affected areas and self-quarantining to limit the spread of the Coronavirus, you can require volunteers to disclose their recent travel destinations. **[updated 3/12]**

**40. What if a volunteer is showing symptoms of illness or respiratory problems? Should they stay home?**

Yes. Grantees and project sponsors should instruct volunteers to stay home, seek medical attention, and not return to their service sites. If a volunteer feels ill, is showing symptoms of



illness, or thinks they may have COVID-19, they should be directed to consult with their health care providers. For further guidance, they should be directed to the [CDC guidelines](#). The decision whether to discontinue isolation should be made in consultation with their health care providers and federal, state, and local health departments. Grantees and sponsors should consistently apply and clearly communicate their policies regarding under what conditions they will instruct volunteers to self-quarantine. Grantees and project sponsors should also document when they have instructed a volunteer to stay home due to illness.

To prevent stigma and discrimination during service, do not make a determination to send a member or volunteer home based on race or country of origin. Also, grantees and sponsors must ensure that they maintain confidentiality of any member(s) and volunteer(s) who are believed, or confirmed, to have COVID-19, or other illnesses, as required by the Americans with Disabilities Act of 1990, as amended (ADA). **[updated 4/8]**

**41. What if a volunteer lives with or has been in close contact with someone known to have COVID-19?**

Volunteers who are well but live with, or have been in close contact with, someone who is known to have COVID-19 should promptly notify their respective program/project director. More importantly, the individual should self-report to their physician, and in consultation with their physician, to the [state health department](#) responsible for the local management of COVID-19 issues and follow their guidance and instructions.

The grantee or project sponsor should also refer to CDC guidance for how to conduct a risk assessment of their potential exposure. While maintaining confidentiality, the grantee or project sponsor should inform fellow service members and volunteers of confirmed Coronavirus cases and their potential exposure to COVID-19 at the service site. **[updated 3/12]**

**42. I am a volunteer with a compromised immune system. May I leave my volunteer worksite for a compelling health reason?**

Yes, volunteers who are unable to serve at their assigned service location because of a compromised immune system or other chronic medical condition should notify their project sponsor's director about their medical condition and potential health risk should they have Coronavirus exposure. They should work individually with their project sponsor to determine an appropriate alternative accommodation or measure related to their volunteer service. **[updated 3/12]**

**43. I am a AmeriCorps Seniors grantee. Who should I contact if I have any further questions?**

All AmeriCorps Seniors project sponsors should contact their; Portfolio Manager or Program Officer with any questions about the program's management in regard to the Coronavirus pandemic. **[updated 3/18]**



**44. COVID-19 is impacting my organization's ability to prepare and submit a Federal Financial Report (FFR) due April 30, 2020, for the report period ending March 31, 2020. Can I have an extension to submit my FFR?**

AmeriCorps recognizes that COVID-19 is significantly impacting operations for a number of our grantees and sponsors. As a result, AmeriCorps is extending the due date for semi-annual FFRs. The FFRs that were due April 30, 2020, are now due May 30, 2020. We are in the process of updating the due date in eGrants for all applicable awards. The reporting period for these FFRs remains the same. Grantees and sponsors who can submit their semi-annual FFRs sooner are encouraged to do so. This flexibility is only for FFRs submitted to AmeriCorps. At this time, all recipients must still submit their 272 reports to the Payment Management System on the required schedule or funds will be placed on hold.

AmeriCorps may consider extending the due date for final FFRs in the future, if needed. However, as recipients have 90 days to submit their final FFRs following the end of the performance period, this deadline should not impose an undue hardship on the majority of our recipients.

AmeriCorps is offering this relief pursuant to the Office of Management and Budget memo [M-20-17: Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations](#). **[updated 4/15]**

**45. Can I mail telephone cards to FGP/SCP volunteers so that they are able to use them to call their clients during this pandemic, and to call into in-service meetings?**

Yes. Grantees may issue telephone cards to SCP, FGP, and RSVP volunteers as an allowable cost if the phone cards are used to support volunteers in approved project-related activities. However, you should use a tracking-based mail delivery service to help safeguard and ensure that the phone cards are delivered to the intended volunteer recipients. Simply mailing, via regular mail, a phone card to the intended recipient is not recommended because it does not provide reasonable certainty that you will be able to track receipt from the intended recipient.

When providing telephone cards to facilitate service, grantees should have policies in place that provide clear instructions for volunteers to use the telephone card in providing an allowable service activity. The use of the telephone cards must be tied to service, must support an allowable activity and must be necessary for the performance of the grant outputs and outcomes. The instructions should make clear that using the telephone card for personal purposes, or purposes unrelated to an allowable service activity, is strictly prohibited.

Regarding volunteers' use of telephone cards, grantees must have certain policies in effect and have retain the following internal documentation:



1. Policies and procedures for allowance of this activity in the case of a national emergency; if a grantee does not currently have a specific policy with regard to phone card usage in place, grantees should promptly update or implement a new policy accordingly.
2. Documentation of a volunteer's time served while using the phone card to engage in allowable service activity; documentation should include a phone log with start time – end time, person called, number called, etc.
3. The cost of the cards

**[updated 4/20]**

**46. Is using grant funds to purchase masks and gloves for volunteer use an allowable cost?**

All costs must be allowable, reasonable, and allocable per 2 CFR §§200.403 - 405. Masks and gloves, which enable volunteers to engage in service during the COVID-19 pandemic, are necessary and reasonable for the performance of the Federal award. These costs can be attributed to a "Other Volunteer Support Costs" line item and should reference other volunteer expenses to avoid the need for an amendment. As a reminder, any costs charged should be reasonable and prudent, properly valued, and consistent with the sponsoring organization's account practices. **[updated 4/17]**

**47. COVID-19 has had a direct impact on my ability to continue my program. Following local, state, and/or federal guidelines, I suspended volunteer activities to ensure the safety of our staff and our AmeriCorps Seniors Volunteers. As a result, the costs associated with our grant are lower than originally anticipated. What should I do?**

A grantee may have unexpended funds from Fiscal Year 2019 or 2020. Grantees may request to Carry Forward unexpended funds into the following budget period for Year 1 and Year 2 grants. A Carry Forward action acts as an augmentation on the following year's budget. A Carry Forward action may only take place within a three-year performance period. Year 3 grants are not able to carry funding forward but may be awarded a no-cost extension. An extension is a one-time lengthening of the grant period allowing for additional time spend awarded funds on approved line items.

To help ensure consistency, AmeriCorps Seniors determined a minimum threshold for requests. The minimum threshold to request a Carry Forward or an extension for Q3 requests is \$10,000.00 and the minimum threshold for Q4 requests is \$5,000.00. If a grantee anticipates funds in excess of these amount, they may contact their Program Officer/Portfolio Manager to request a Carry Forward or a no-cost extension, as appropriate.

For additional information, [please refer to the May 1, 2020 GovDelivery message: Carry-Forward and No-Cost Extensions](#). **[updated 5/5]**



**48. Can AmeriCorps Seniors volunteers educate senior citizens about census-related fraud and scams?**

Yes. AmeriCorps is aware that many senior citizens may be targets of financial scams and fraud regarding the 2020 Census activity. Several AmeriCorps and AmeriCorps Seniors grantees and sponsors have inquired whether educating senior citizens about these scams and fraud would be an allowable activity for AmeriCorps and AmeriCorps Seniors members and volunteers. AmeriCorps has a long-standing policy of prohibiting AmeriCorps and AmeriCorps Seniors volunteers from engaging in decennial census activity during service hours that includes engaging in activities such as the promotion of the census, education individuals about the importance of the census, or helping people fill out census forms.

AmeriCorps has determined that it is allowable for AmeriCorps Seniors volunteers to educate senior citizens about financial scams and fraudulent activity that relate to the 2020 Census. Educating senior citizens about fraud and scams associated with the 2020 Census does not fall within the parameter of prohibited “census activity” because it is not promoting or educating people about the importance of the census. Moreover, educating senior citizens about how to recognize financial scams and avoid falling victim to fraudulent activity that arise in relation to the 2020 Census also falls squarely within AmeriCorps Seniors and AmeriCorps goals and objectives. **[updated 5/8]**

**49. Should the Economic Impact Payments authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) be counted as income when determining income eligibility for FGP and SCP volunteers?**

No. The IRS has advised that Economic Impact Payments (EIPs) are not considered taxable income, but rather advances of a refundable federal income tax credit created by the CARES Act. Therefore, EIPs are not considered income for purposes of Foster Grandparent and Senior Companion stipend eligibility. Accordingly, EIPs would not be classified as income as defined under the SCP and FGP regulations. See 45 CFR §§ 2551.44, 2552.44. Because EIPs are not considered income for purposes of stipend eligibility, any EIP that a Foster Grandparent or Senior Companion receives would not, by itself, place him or her over the maximum income eligibility level to continue to receive a stipend. However, as always, it is recommended that individuals talk with their tax advisors about any further tax questions regarding EIPs. **[updated 5/18]**

**50. I need to purchase supplies that are necessary as a consequence of COVID-19, in order for volunteers to perform approved service activities. Is it allowable to use grant funds to purchase these supplies?**

Under certain conditions, it is allowable for AmeriCorps Seniors grantees to use grant funds to purchase supplies that have become necessary as a consequence of operational disruptions due to the impact of the COVID-19 pandemic. If a service activity is disrupted or otherwise adversely impacted due to COVID-19, grant recipients may develop alternative types of service activities that are not specifically defined in the grant but are consistent with the goals



and mission of the AmeriCorps Seniors program. The grantee should submit their written request to develop alternative activities and obtain written (email) approval from its Program Officer/Portfolio Manager as soon as practicable. Please see FAQ #19 for more information.

If the approved service activity requires new supplies, the grantee must ensure that all costs are allowable, reasonable, and allocable, and in support of approved service activities, in accordance with OMB cost principles set forth in 2 CFR §§200.403 – 405. All AmeriCorps Seniors grant recipients must follow the requirements in its “Budgetary Changes” section as prescribed in the terms and conditions in the grant award supporting documents. Please note, if the federal share of a grant is greater than the “Simplified Acquisition Threshold” amount of \$250,000 and the grantee’s cumulative changes exceeds 10% of the total budget, the grantee must obtain approval by submitting an amendment request. If the change is below 10%, the grantee does not need to obtain approval, but it still needs to document the change in its Memo to File. Many costs can be attributed to a “Other Volunteer Support Costs” line item, which would preclude the need to reallocate funds to a new line item and avoid the need for an amendment. As a reminder, any costs charged should be reasonable and prudent, properly valued, and consistent with the sponsoring organization’s account practices and documented.

In normal circumstances, per AmeriCorps Seniors guidance, the Memorandum of Understanding between the sponsor and volunteer station should address payment arrangements for supplies (i.e., whether the sponsor or the volunteer station pays for supplies that a volunteer station needs). AmeriCorps Seniors recommends that that grantees and volunteer stations continue that practice and update, as needed, their Memoranda of Understanding outlining any new costs related to supplies needed in light of COVID-19. While a recommended practice, however, addressing payment arrangements in the Memorandum of Understanding between the sponsor and the volunteer station is not required.

For some supplies that are monetarily expensive, such as technology to connect virtually, the grantee should develop a “user agreement” with each volunteer that lays out the appropriate uses of the supplies that align with the program’s goals and objectives and should also set forth prohibited uses. With certain program supply items, the grantee should implement an inventory management plan and use it prior to purchasing and distributing key supply items. An inventory management plan should, at a minimum, document the following for each supply:

- Serial number, if applicable
- Date of purchase
- To what volunteer it is assigned
- Date it was delivered to the volunteer
- Volunteer’s confirmation of receipt, including date
- Date in which it was returned by volunteer
- Report of loss of or damage, if applicable



A volunteer is expected to return the supply item prior to exiting service in the program. It is also recommended that the grantee develop a policy and procedure for asset or supply management if one is not already in place. The grantee should carefully document all the costs associated with the new service activities with a Memo to File, outlined in FAQ

#5. **[updated 6/3]**

**51. COVID-19 is impacting my ability to secure local resources that will support agency and program goals and objectives. Since AmeriCorps is waiving all match requirements for all AmeriCorps Seniors grants that were awarded in FY 2019 and FY 2020, can I submit a request to replace match funds, that were previously accounted for and reported, with agency grant funds?**

AmeriCorps recognizes that the COVID-19 pandemic is seriously affecting economic conditions in communities throughout the nation and that this lack of resources in a community adversely impacted by COVID-19 may prevent AmeriCorps and AmeriCorps Seniors grantees from having the means to cover all or a portion of their required non-federal contribution. Consequently, grantees may have the ability to address this resource deficit by replacing previously reported match funds with grant funds for AmeriCorps and AmeriCorps Seniors projects that are active and have not surpassed the project end date.

Please note, however, that this is not a recommended practice and may result in unintended risks to an organization's financial health. Therefore, grantees should consider all options before processing a replacement of previously reported match funds with agency grant funds. Assuming this action falls within your organization's policies and procedures, a grant project's match funds remain tied to specific expenses and corresponding activities that were identified as necessary to achieve the goals of your approved program. AmeriCorps Seniors grantees who wish to take this action must clearly document that the justification for such financial accounting procedures is due to COVID-19, as records may be subject to review under the Improper Payments Elimination and Recovery Improvement Act (IPERIA) and/or AmeriCorps monitoring activities. Additionally, please refer to the program-specific terms and conditions to determine whether these actions must be approved by AmeriCorps. Further, every effort should be made to maintain the same level of service that was funded. **[updated 6/15]**

**52. During COVID-19, would it be allowable for RSVP and/or Senior Companion Volunteers to support clients in nursing homes or long-term care facilities through telephone reassurance programs to help combat social isolation?**

Yes. RSVP and/or Senior Companion Volunteers may support clients who participate in a telephone reassurance program in nursing homes or other long-term care facilities to help combat social isolation. **[updated 9/18]**



### **53. Are expenses associated with providing AmeriCorps Seniors volunteers Wi-Fi mobile “hot spot” devices and services during COVID-19 an allowable cost?**

Under certain conditions, during COVID-19, AmeriCorps Seniors grants may claim as allowable costs the purchase and use of Wi-Fi mobile “hot spot” devices and services in order for AmeriCorps Seniors volunteers to carry out their service activities. The grantee must determine that the expenses are reasonable, necessary, and allocable in accordance with OMB Cost Principles. The grantee must only provide the devices and services to volunteers who are not performing service activities at the physical project site. Additionally, the grantee must only provide the devices to volunteers with an established bona fide need. There must be no duplication of such services and devices. For example, a volunteer must not already have Wi-Fi access while teleserving in their home that would otherwise allow them to perform their service activities. Also, there must be no supplantation of expenses related to such devices and services. For example, the grantee cannot replace funding from other sources that is already intended to pay for the devices and services with AmeriCorps Seniors grant funding. The grantee also cannot receive duplicated payments for the devices and services; that is, the grantee must ensure that it does not receive funds from other sources for the same purpose of paying for the services and devices.

In addition, the grantee should have a policy regarding proper computer use by all volunteers. Along with this policy, the grantee should develop a “Rules of Behavior” (ROB) policy that sets forth the rules governing appropriate use of the “hot spot” devices and services, requiring each volunteer who is provided a device to be trained on ROB and to sign a written agreement to follow them. Finally, to ensure that only authorized volunteers have access to “hot spot” devices and services, grantees should implement an inventory management plan and use it for each volunteer assigned a device. An inventory management plan should include:

- Hot spot services contract with Wi-Fi provider and record of subscription costs for services and devices
- Serial number of hot spot device, if applicable
- Dates of purchase of device and services
- To what volunteer a device is assigned and date of assignment
- To what volunteer services are assigned and date of assignment
- Date when volunteer access to hot spot device and services are activated
- Volunteer’s confirmation of receipt of device and/or services, as appropriate, including date
- Date in which device was returned by volunteer, if applicable
- Date when volunteer access to hot spot device or services is terminated, if applicable
- Report of loss of or damage to device, if applicable

It is advisable that each volunteer who is provided a device or services receives training on the use of the device and services prior to beginning usage. The training should include



measures that all users must take to protect privacy and follow security protocols. **[updated 9/24]**

***NOTE: For all actions taken related to COVID-19, please ensure you have written documentation, such as a memo to file, that address steps taken in response to COVID-19.***