CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS
AmeriCorps State and National Program Specific Questions
Last update 3/13/20

CNCS is closely monitoring the latest developments related to COVID-19. As Americans prepare for the possibility of a COVID-19 outbreak in their community, you may have concerns about the potential impact of this new virus on your program. To help address these concerns, we are providing you with these FAQs. They will be updated regularly.

In the event that AmeriCorps State and National 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 site due to COVID-19, will CNCS 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.

Can AmeriCorps State and National grant funds be used to pay for exceptional expenses incurred to ensure safety of members, staff and students, including temporary housing?

There is no specific prohibition against a program providing housing, temporary or otherwise, to AmeriCorps members. Member benefits, such as housing, that are temporarily amended to address issues arising because of COVID-19 need to be documented and applied consistently across the program. To the extent that a program is not following its usual policies and procedures, like providing housing when housing is not typically provided to members, such deviation should be approved at the highest level of the grantee organization that is practicable. Formal amendment of the organization’s existing policies and procedures is not required.

Given that the CDC has issued a recommendation to businesses and schools to waive requirements for medical documentation of illness, may we waive the requirement to secure documentation for AmeriCorps members who are suspended for medical reasons? From the CDC website:

“Do not require a healthcare provider’s note for employees who are sick with acute respiratory illness to validate their illness or to return to work, as healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way.”
The requirement to provide medical documentation is not an AmeriCorps State and National requirement. Thus, grantees can deviate from whatever medical documentation requirements they have in their existing policies and procedures related to compelling personal circumstances (CPC) as long as the programs retains contemporaneous documentation that the deviation from the requirement was related to COVID-19 (i.e., the member was exited for CPC because a sibling came in contact with COVID-19 and did not want to contaminate other members in the program) and the program recognizes that this health reason was beyond the member’s control pursuant to 45 CFR § 2522.230.

May ASN members earn hours when their service sites are closed due to COVID-19?
To earn hours, a member must engage in service activity. 42 U.S.C. §12602 (a)(2). Accordingly, grant recipients may not give members constructive credit for hours that were not served. However, to the extent training or teleservice is possible, CNCS will generously approve such deviations from the grantee’s normal policies and practices if the deviation is documented and approved by the grantee’s leadership and the planned national service is disrupted due to COVID-19.

In light of the FAQ related to payment of stipends during service interruptions, should programs suspend members from the program if service locations are closed?
Programs may decide to suspend AmeriCorps members during a service interruption because COVID-19 temporarily halts the member’s service period. Grant recipients may develop alternative activities for the members.

Do you anticipate a change to the teleservice policy for AmeriCorps State and National members? If a site were to close for more than 2 days within a pay period, are members allowed to teleserve for more than those 2 days?
CNCS considers the COVID-19-related challenges facing AmeriCorps State and National grantees to be a rare and unique circumstance where programs might increasingly employ teleservice when it is appropriate and compatible for achieving program objectives.

AmeriCorps State and National’s policy is that teleservice should be rare and thus does not specify a maximum number of days that teleservice is allowed. AmeriCorps State and National does not anticipate changing existing teleservice guidance. The AmeriCorps State and National guidance on teleservice can be found here:

Is CNCS going to cut the number of required service hours to be eligible for a full Segal Education Award if an AmeriCorps State and National member’s site is closed due to COVID-19?
CNCS does not have the authority to reduce the number of service hours required to be eligible for a full Segal Education Award. AmeriCorps State and National grantees have the option to suspend members and reinstate them later, when circumstances allow, or they may exit the member for CPC due the closure of the service location.

If we have a member who is exposed to or diagnosed with COVID-19, do we need to notify CNCS?
No. Grant recipients do not need to notify CNCS if a member is exposed to or diagnosed with COVID-19.
May AmeriCorps State and National members be paid living allowances while Suspended from service due to program closures related to the COVID-19?
In order to provide grantees the maximum flexibility as a result of COVID-19, CNCS has determined that AmeriCorps AmeriCorps State and National members may be paid living allowances and benefits while they are in a Suspended from Service status, if the reason for suspension is due to COVID-19. Programs can also elect not to pay living allowances if they suspend their AmeriCorps State and National members.

If an individual is suspended for any other reason, the living allowance and other benefits are also to be suspended. If a grantee organization decides to continue to pay members while they are in a Suspended status, they must be prepared to obtain additional funding to cover living allowance and benefit expenses once members are reinstated.

Programs should keep in mind that if or when they re-start the program and take members off suspension, they will have to continue paying the living allowance and benefits as members accrue hours. This may necessitate some programs raising additional funds for those costs as they are unlikely to have budgeted for living allowances and benefits beyond their initial program duration.

I have a fixed amount grant. If the members don’t serve hours, may I draw down and retain more than what is supported by the hours served?
The statute requires fixed amount grant recipients to return a pro-rata share of the funds that are not supported by service hours for the position. 42 USC 12481(l)(3)(A)(i). That is, if a grant recipient is awarded $10,000 per MSY and a member is exited for CPC having completed 50% of the term, the statute currently authorizes the grant recipient to keep $5,000.

How can Full Cost Fixed Amount Grant recipients cover the cost of continuing to pay living allowances and benefits to AmeriCorps members if the members are not able to perform service hours? Can Full Cost Fixed Amount grant recipients draw funding amounts based on the total award value for filled member positions?
CNCS does not have the authority to alter the method for calculating the amount of funding a program may claim as a Full Cost Fixed Amount Award. The basis for calculating the amount of award funds that can be retained by a program is based on the proportion of hours served by members in relation to the number of hours required for each member’s term of service. CNCS recognizes the financial challenge that Full Cost Fixed Amount grant recipients may face in administering their program while program activities are disrupted.

Four alternatives available to grantees with Full Cost Fixed Amount awards, include:
1. Identify alternative service activities that members can perform to earn service hours so programs may continue drawing funds;
2. Continue to pay member living allowance but Suspend members because service activities have been disrupted by COVID-19;
3. Let members remain in In-Service status and continue paying the living allowance and benefits; or
4. Exit the member for Compelling Personal Circumstances due to the disruption of service activities related to COVID-19.
When a member is suspended for COVID-19 reasons, can they continue to receive child care and health care?
Yes – a member suspended due to COVID-19 activities may continue to receive the child care benefit (for up to 12 weeks) and health care benefit provided by the grant recipient. To ensure no lapse in child care coverage, the AmeriCorps State and National grantee must notify GAP Solutions in writing within five business days after a member’s status changes. Costs incurred due to the grantee’s failure to keep GAP Solutions immediately informed of changes in a member’s status may be charged to the grantee’s organization.