CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS
AmeriCorps State and National Program Specific Questions
Last update 3/31/20

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.

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 CNCS’s statute and regulations for applicable requirements.

1. 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. [updated 3/12]

2. 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. [updated 3/12]
3. 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. [updated 3/12]

4. 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. [updated 3/12]

5. 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. [updated 3/12]

6. 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: https://www.nationalservice.gov/sites/default/files/documents/ASN%20Teleservice%20Guidance.pdf. [updated 3/12]

7. 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. [updated 3/12]

8. If we have a member who is exposed to or diagnosed with COVID-19, do we need to notify CNCS? Yes, on a voluntary basis, please notify your Program Officer or Portfolio Manager if you have a member who is diagnosed with COVID-19. Share the project name, city location and number of members diagnosed. In order to protect the privacy of the individual, please do not share their name or other personally identifiable information. You should follow guidance provided by the CDC and your local health department. [updated 3/17]

9. 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 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. [updated 3/13]

10. 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 12581(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. [updated 3/13]

11. 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.

[updated 3/13]

12. 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. [updated 3/13]

13. May members be exited for compelling personal circumstances if they are unable to serve?
For AmeriCorps VISTA and AmeriCorps NCCC members, the agency will follow established protocols. Grantees and project sponsors should direct specific questions to their Portfolio Manager, Program Officer, or NCCC campus staff. [updated 3/16]

14. If an AmeriCorps State and National program allows members to do additional training at a time that they cannot serve at their sites, will they be allowed to exceed the maximum 20 percent aggregate training hours?
No, per 45 CFR § 2520.50 How much time may AmeriCorps members in my program spend in education and training activities?, “No more than 20 percent of the aggregate of all AmeriCorps member service hours in your program, as reflected in the member enrollments in the National Service Trust, may be spent in education and training activities.” [updated 3/16]

15. When a commission is seeking approval for alternative AmeriCorps State and National member service activities for one or more of their subrecipients, are commissions required to submit separate requests for each program or could a commission submit a request for all of its competitive programs?
When a commission is seeking approval for alternative AmeriCorps member service activities, they need to identify a specific subrecipient and the associated alternative member activities for that subrecipient. Blanket approval is not possible because we need to fully understand the possible alternative member service activities available. To that end, please describe the member service activities as specifically as possible and avoid using
terms such as “assist,” “support,” or other ambiguous terms. The more specificity you provide, the faster CNCS will be able to provide approval.

We want to balance the possible administrative burden to grantees, so if two or more subrecipients will engage in the same alternative member service activities, the requests can be aggregated into a single email or document. The information submitted by a grantee is intended to be used to determine if an amendment to the Notice of Grant Agreement is necessary and to reduce the possibility of later disallowance and financial burden on grantees.

Some important reminders:

1. Programs should, of course, prioritize protecting the health and safety of members. If the members will need specific training, protective equipment, or other precautions to carry out the new service activities safely, the program should ensure that it can be provided.
2. It is always the responsibility of the grantee/program to ensure that the service activities are compliant. Even though a PO/PM can give preliminary approval for an activity, if it is determined later that the activities were not compliant, the grantees may be subject to disallowance or other sanctions.

[updated 03/20]

16. Is CNCS Program Officer/Portfolio Manager approval needed before programs may begin engaging in alternative member activities given the language in the Program Specific Grant Terms and Conditions regarding requests during officially declared state or national disasters?
Yes, an email confirmation is required before you start alternative activities. Once you have the email confirmation, additional information may be requested but your request for alternative member activities does not have to be completed before you redirect your members.

A federal State of Emergency is distinct from an officially-declared disaster. Therefore, grantees should follow the COVID-19 FAQ on alternative service activities where a state or federal disaster has not been declared.

Where an officially-declared state or national disaster has been declared, the AmeriCorps State and National Program Specific Terms and Conditions on disaster-related programmatic changes are applicable. But please remember, the terms and conditions also state: “While written approval from CNCS is not required before making disaster-related programmatic changes, CNCS reserves the right to limit or deny disaster-related programmatic changes, including disallowing costs associated with the disaster related activities.” [updated 03/20]

17. As an alternative member service activity, can AmeriCorps State and National members assist grocery markets or pharmacies in delivering foods and medicines to quarantined people or other disadvantaged people?
No, AmeriCorps State and National members are statutorily prohibited from engaging in any service that “provides a direct benefit to” a business organized for profit. AmeriCorps members may be engaged in the distribution of food or medicine on behalf of public school districts, other public entities, or nonprofit organizations. We invite programs to think creatively so that we can approve your alternative member service activities. [updated 03/20]
18. I am currently conducting an evaluation of my AmeriCorps-funded program, but closures of service locations and/or disruptions to service activities due to COVID-19 are interfering with data collection for the evaluation. Can the timeline for my evaluation be extended?

Yes, grantees whose evaluations are affected by COVID-19 are eligible to apply for this type of relief – Alternative Evaluation Approach (AEA). The AmeriCorps State and National Alternative Evaluation Approach (AEA) guidance allows grantees to request an extended timeline for an evaluation that cannot be completed during the current grant cycle. Please follow the instructions in the AEA guidance for how to submit an AEA request outside of the recompete grant application process. [updated 03/20]

19. Closures and disruptions due to COVID-19 are making it difficult for me to complete my Grantee Progress Report. Can the GPR due date be extended?

The Grantee Progress Report instructions state the following:

*If you cannot meet the submission deadline for the progress report, you must request an extension from your Program Officer/Portfolio Manager. Requests for extensions may be granted when:

1. The report cannot be finished in a timely manner for reasons legitimately beyond the control of the grantee, and
2. CNCS receives a request explaining the need for an extension before the due date of the report.*

Closures and service disruptions related to COVID-19 qualify as “reasons legitimately beyond the control of the grantee,” and so are a legitimate basis to request a GPR due date extension. Please contact your Program Officer/Portfolio Manager if you need to request an extension. [updated 03/20]

20. Can AmeriCorps State and National members get a full Education Award if they were not able to obtain their full hours due to circumstances related to COVID-19?

It depends. There are three situations that have different outcomes.

1. **AmeriCorps State and National members that have served less than 15 percent of the minimum required hours for the Term of Service at time of exit.**
   AmeriCorps State and National members who have served less than 15 percent of the minimum required hours for a Term of Service at the time they are exited are not eligible for a partial education award. Nor are these members eligible for a full education award with a compelling personal circumstance exit related to COVID-19. 45 CFR § 2522.230(a)(2).

2. **AmeriCorps State and National members that have served between 15 percent and 50 percent of the minimum required hours for the Term of Service at the time they are exited.**
   AmeriCorps State and National members that complete between 15 and 50 percent of the minimum required hours for the Term of Service may be exited for compelling personal circumstances proportional to the number of hours they have served. They are not eligible for a full education award with a compelling personal circumstance exit related to COVID-19. 45 CFR § 2522.230(a)(2).

3. **AmeriCorps State and National members that have served more than 50 percent of the minimum required hours for the Term of Service at the time they are exited.**
   An AmeriCorps State and National member who has completed more than 50 percent of the minimum number of hours required to successfully complete their Term of Service will be eligible to receive the full education award amount with a compelling personal circumstance exit related to COVID-19. Compelling personal circumstances are the determination of the AmeriCorps program. 45 CFR § 2522.230(a)(2).

[updated 3/31]
21. What process will grantees use to exit those members who have served more than 50 percent of the minimum required hours for a Term of Service?

This is a two-part process:

1. Exit of the member and
2. Document the difference between the served hours and the hours entered on the exit form.

**Part 1. Exit of the member**

If an AmeriCorps State and National member is no longer able to serve as a result of circumstances related to COVID-19, a program may enter the minimum number of hours needed for a full award for the member’s Term of Service; and exit the member with a status of “Eligible for Partial Award (member did not complete service for compelling personal reasons)” See example below:

### Service Information

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Campus Compact AmeriCorps Program</th>
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<tbody>
<tr>
<td>Service Location</td>
<td>University of Northern Iowa</td>
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<tr>
<td>Type of Enrollment</td>
<td>Minimum Time</td>
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**Education Award Status**

Indicate whether or not the Member is eligible for an education award. Please be sure to follow the Corporation’s regulations in making this selection. If the Member is going to serve another term under the National Service Trust, a new National Service Enrollment Form must be completed.

- [x] Eligible for partial education award (member did not fully complete service for compelling personal reasons)

**Part 2. Noting the difference between the served hours and the hours entered on the exit form**

Programs/Subgrantees/Operating Sites will submit a report for their prime grant identifying:

1. Each member who was exited for a partial award for a compelling personal circumstance due to COVID-19 and their NSPID,
2. The hours served by the member,
3. Confirm that those hours were more than 50 percent of the minimum required hours for the Term of Service, and
4. The hours that were not served due to COVID-19 to equal the full hours reported on the member exit form.

This will be submitted to the prime grantee concurrent with the deadline for information to be submitted as part of the Annual Progress Report due to CNCS in December 2020.

The prime grantee will not submit that information to CNCS but rather the documentation and approvals will be retained by the prime grantee and the programs/subgrantees/operating sites in member files. [updated 3/31]
22. What if a member’s service cannot restart due to COVID-19?
Per Section 3514(a)(2) of the CARES Act, CNCS requires that the grantee exit a member when the grantee determines that completion of the originally scheduled service term is no longer practicable. Such a member is entitled to an education award consistent with the percentages specified above. [updated 3/31]

23. How will CNCS determine the amount of funds a program may retain for an awarded full-cost, fixed-amount grant?
Per Section 3514(c) of the CARES Act, CNCS has determined that grantees with full-cost, fixed-amount grants whose program operations have been disrupted by COVID-19 may retain the amount of awarded funds based on the total MSY value of regular enrolled member service positions multiplied by the awarded cost per MSY up to the amount of award funds as stated on the Notice of Grant Award. [updated 3/31]