



CORPORATION FOR NATIONAL & COMMUNITY SERVICE



## CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS

### AmeriCorps State and National Program Specific Questions

Last update 6/11/20

CNCS 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 CNCS's statute and regulations for applicable requirements.*

#### **I am an AmeriCorps State and National member with questions about my service/benefits, who should I contact?**

AmeriCorps State and National members with questions can review the FAQs below, or contact their program director or [State Service Commission](#). Additional information is available by contacting the National Service Hotline at 1-800-942-2677, via [webform](#), or [LIVE CHAT](#).

#### **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]*

#### **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 from a CNCS Program Officer/Portfolio Manager before you start alternative activities. Once you have the email confirmation, the CNCS Program Officer/Portfolio Manager may request additional information but your request for alternative member activities does not have to be completed before you redirect your members. Review of the alternative activities will be focused on ensuring no proposed activities are prohibited, unallowable, duplicate or supplant existing staff or volunteer roles.

An officially declared national emergency is distinct from an officially declared state or federal 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, moved to FAQ 1 4/7, updated 4/14]*

**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 excused 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%20006%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?**

Please see FAQ #20. *[updated 3/12, 4/7]*

**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 and benefits 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 elect to:

- Provide members with both living allowance and health benefits;
- Provide members with health benefits only; or
- Provide members with no living allowance and no benefits.

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, 4/6, 5/8]*

**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?**

Please see FAQ #23. *[updated 3/13, 4/7]*

**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?**

Please see FAQ #23.

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 (CPC) due to the disruption of service activities related to COVID-19.

*[updated 3/13, 4/7]*

**12. When a member is suspended for COVID-19 reasons, can he or she continue to receive child care and health care?**

It depends. If a member is enrolled in a program that does not decide to continue to pay the living allowance and benefits, then no.

If a member is enrolled in a program that decides to continue to pay the living allowance and benefits, then 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 prevent a 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, 4/7]*

**13. May members be exited for Compelling Personal Circumstances (CPC) if they are unable to serve?**

Within AmeriCorps State and National, grantees determine compelling personal circumstances (CPC). Extended site closures and sustained disruptions could reasonably justify a CPC exit under [45 CFR § 2522.230\(a\)](#).

Before exiting a member, please see FAQ #20 and FAQ #21.

For AmeriCorps VISTA and AmeriCorps NCCC members, CNCS 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, 4/7, 4/14]*

**What if a member's service cannot restart due to COVID-19?**

Per Section 3514(a)(2) of the CARES Act, if CNCS requires a member to exit because CNCS determines that

completion of the originally scheduled service term is no longer practicable due to COVID-19, CNCS may determine that the member is entitled to an education award consistent with the percentages specified above. *[updated 3/31, 4/7, 4/14]*

### **What qualifies as "no longer practicable due to COVID-19"?**

Under the CARES Act, when service is no longer practicable due to COVID-19, a member is required by CNCS to exit. Such members may receive an education award consistent with the percentages specified in FAQ #20. Circumstances indicating service is no longer practicable due to COVID-19 include, but are not limited to:

- Lack of service activities, such as lack of on-site or teleservice assignments, lack of teleservice resources, or project closure;
- Continued service would pose a risk to the health or safety of the AmeriCorps member or others, for example, the AmeriCorps member tests positive for COVID-19 or the AmeriCorps member self-identifies to be high risk and unable to serve due to risk(s) posed by COVID-19;
- AmeriCorps member has full-time caregiver responsibilities, including situations in which the member's regularly scheduled caregiver services have been canceled or disrupted due to COVID-19.

CNCS will rely on grant recipient certification when exiting the members that service is no longer practicable, consistent with this guidance. Members who are not required by CNCS to exit are not entitled to a full education award *[updated 4/14]*

### **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?**

Moved answer to be part of FAQ #1 *[moved 4/7]*

### **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 recomplete 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). Please see Q22 and Q23.

**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

**Program Name:** Campus Compact AmeriCorps Program

**Service Location:** University of Northern Iowa

**Hours of Service:** 1700

**Service Start Date:** Oct 16, 2019

**Expected End Date:** Oct 15, 2020

**Completion Date:** 03/26/2020

**Type of Enrollment:** Minimum Time

## 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.

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?

Moved to FAQ #13. *[moved 4/14]*

### 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 Member Service Years (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. This is consistent with how Education Award Program (EAP) grantees draw down their funds. *[updated 3/31, 4/7, 4/14]*

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

CNCS is waiving all match requirements for all AmeriCorps State and National (ASN) cost reimbursement grants that were awarded in FY 2019 and FY 2020, including ASN grants that will be awarded during the

remainder of FY 2020. CNCS has the authority to issue a blanket waiver under 42 U.S.C. § 12571(e)(4) and consistent with 45 CFR 2521.70 when CNCS “determines that such a waiver would be equitable due to lack of available financial resources at the local level.” ASN grantees who wish to take advantage of this waiver in full or part do not have to take any action at this time. CNCS will provide additional FAQs in the near future that outline the implementation process. *[updated 4/9]*

**25. 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?**

CNCS recognizes that COVID-19 is significantly impacting operations for a number of our grantees and sponsors. As a result, CNCS 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 CNCS. 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.

CNCS 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.

CNCS 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]*

**26. Will I still qualify for interest accrual benefits if I was prevented from completing my full term of service due to COVID-19?**

Individuals who are prevented from completing their full term of service due to COVID-19 may still qualify to receive interest accrual benefits. In accordance with 45 CFR § 2529.10, the National Service Trust (Trust) pays up to 100 percent of the interest that accrued on an AmeriCorps member’s qualified student loans during their service. These are the conditions that apply:

- An interest payment can only be made after you have exited the program and have earned a full, partial, or pro-rated education award.
- The percentage of interest accrual benefit that you are eligible to receive is based upon your total service hours accrued, or the amount of time (in days) you were enrolled when you exited.
- If you qualify for additional hours/time under the CARES Act, such hours/time will be provided to the Trust and be considered “hours/time served.”
- The Trust will only pay interest on qualified student loans, as described on the [Using Your Segal AmeriCorps Education Award web page](#).

For the AmeriCorps State and National Program, the portion of interest that the Trust will pay is determined by the type of service (full- or part-time) and how many national service hours were certified by your program. If you are exited for CPC, you may be eligible for a pro-rated education award, and therefore some payment of the interest accrued on your loan. If you are serving in the AmeriCorps State and National program, it is up to your individual program to determine CPC. Circumstances related to COVID-19 could reasonably justify a CPC exit. Please see the ASN FAQs regarding your eligibility for additional hours under

the CARES Act. If you exited your ASN program early, and your exit was not for a CPC, you are not eligible to have the Trust pay the interest that accrued while you served. *[updated 4/14]*

**27. Will I still qualify for forbearance if my term of service is in a Suspended Status, or if I am in an Administrative Hold status or on emergency leave, due to COVID-19?**

Per CNCS regulations 45 CFR § 2529.20, your lender is responsible for approving or denying your forbearance request. The Corporation for National and Community Service (CNCS)—the federal agency that oversees AmeriCorps—provides verification that you are serving in an approved AmeriCorps position (which includes positions in the AmeriCorps State and National Program (ASN), the AmeriCorps NCCC Program, and the AmeriCorps VISTA Program).

Once you are enrolled in the National Service Trust, you can submit a request online through My AmeriCorps to verify your involvement in AmeriCorps and request that your qualified loans be put in forbearance during your service period. Generally, your loan remains in forbearance until you exit from the program. Exiting from the program includes both exiting at the scheduled end of your service term and exiting early from the program, before the scheduled end. After you exit from the program, you are responsible for repaying your loan according to its terms. For more information, [visit our website](#). *[updated 4/15]*

**28. Site closures and service disruptions related to COVID-19 will make it difficult for my ASN program to collect output and outcome data and meet performance measure targets by the end of the program year. How should I handle this?**

Grantees are encouraged to use flexible strategies for collecting performance measure data, such as delaying collection timeframes and/or using different data collection instruments (including online tools), as long as the new data collection strategies are still consistent with the Performance Measure Instructions. However, given the disruptions in service experienced by many grantees as a result of COVID-19, CNCS understands that it may not be possible for affected grantees to meet their performance targets for the current grant year. [Please follow the existing Grantee Progress Report guidance for how to report unmet performance measure targets](#). CNCS intends to be as flexible as possible when reviewing and assessing compliance with the Performance Measures. CNCS will also not take any actions for failing to timely notify CNCS that your program will not be able to meet the Performance Measures (45 C.F.R. § 2522.630; 2 C.F.R. § 200.338.). *[updated 5/8]*

**29. How does a full-cost, fixed-amount grantee show that their program operations have been disrupted by COVID-19? Must the disruption in program operations interrupt the members' service? What documentation will qualify for the program to be able to retain program funds based on enrollment rather than member completion?**

Per Section 3514(c) of the CARES Act, full-cost, fixed-amount grantees may only retain funds based on the total Member Service Years (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 **for those members who were exited early, were suspended, or who served in a limited capacity**.

Fixed Amount grantees must document how their member's service was disrupted by COVID-19. Grantees documentation must show that the "participants who exited, were suspended, or are serving in a limited capacity due to COVID-19."

If the members exited early or departed from the program for non- COVID-19 related reasons, such funds cannot be retained by the program. Grantees must retain this documentation as a grant record, consistent with

2 C.F.R. §200.333. CNCS will require that full-time fixed amount grant programs that do not have this required documentation return the appropriate funds to CNCS.

Additionally, the process for drawing funds from the Payment Management System has not changed. Once you have determined the amount earned, you may draw funds accordingly. Please note that you should only draw based on immediate cash needs, to minimize the amount of cash on hand.

All other requirements about drawing funds remain intact, including, that federal recipients should request "...funds from the Payment Management System only for immediate disbursement (3 business days) and reimbursement." as stated on the [PMS homepage](#). This is also consistent with the Cash Management Improvement Act. *[updated 5/28]*

**30. COVID-19 is impacting my ability to secure local resources that will support agency and program goals and objectives. Since CNCS is waiving all match requirements for all AmeriCorps State and National (ASN) cost reimbursement 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 federal grant funds?**

CNCS 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 CNCS grantees from providing 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 federal grant funds for CNCS projects that are active and have not surpassed the project end date.

Please note that this is not a recommended practice and may result in unintended risks to an organizations financial health. Therefore, grantees should consider all options before processing a replacement of previously reported match funds with CNCS 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.

ASN 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) or CNCS monitoring activities. This would be true for prime and subgrantees. Additionally, please refer to the program-specific terms and conditions to determine whether these actions must be approved by CNCS. Further, every effort should be made to maintain the same level of service that was funded. *[updated 6/11]*