

# Senior Corps Virtual Conference 2014

---

**Session:** Prohibited Activities Overview

**Speaker:** Mal Coles, Atlantic Cluster Area  
Manager



**This session will begin shortly.**

# Prohibited Activities Overview

## The Ins and Outs of Compliance



# Objectives

- Identify activities prohibited to volunteers within Senior Corps projects
- Determine activities that are specifically prohibited while charging time to the Senior Corps Program
- Identify the consequences of engaging in prohibited activities

# Live Session Features

- **Respond in real-time: polling feature**
  - All polling questions are multiple choice
  - The facilitator walks participants through when polling is “open” and when polling is “closed” and instant results are displayed
- **Have your questions answered and provide your feedback: chat feature**
  - Throughout this live session, chat in your questions as they arise

# Agenda

Activity	Duration
Political Activities	6 minutes
Non-Displacement of Employed Workers	6 minutes
Compensation for Service	6 minutes
Labor	6 minutes
Nondiscrimination	6 minutes
Religious Activities	6 minutes
Nepotism	4 minutes

# Prohibited Activity Categories

Political activities

Non-displacement

Labor

Nondiscrimination

Religious activities

Compensation

Nepotism

# Political Activities

In general, no part of any Senior Corps grant or project shall use funds, provide services or assign personnel to influence the outcome of any election to public office, the passage or defeat of legislation or provide voter registration materials or transportation to polls.

# Scenario Summary

## Background

- Emily Newman heads Washington United
- Washington United receives funding for the Senior Companion Program by a grant from CNCS

## Situation

- Ms. Newman is actively involved in local politics
- Ms. Newman ensures nonpartisan voter registration information and applications are available at Washington United
- Ms. Newman, occasionally take trips to Olympia to pressure legislators to provide further funding for causes that she supports. She pays for trips out of her own pocket and does not charge her time to her grant

# Political Activities

---

## Q&A

# Non-Displacement of Employed Workers

A Senior Corps volunteer shall not perform any service or duty or engage in any activity which would otherwise be performed by an employee of the sponsor or which would replace the hiring of or result in the displacement of employees.

# Scenario Summary

## Background

- Plymouth County Action Group is a non-profit dedicated to building healthy communities through targeted support services
- Plymouth relies on volunteers, including RSVP, but also employs three full-time staff members

## Situation

- Plymouth received a funding cut for the three full-time employees and have decided to downsize to two full-time employees
- In order to keep up with administrative duties, an RSVP volunteer is asked to step in and help respond to email correspondence

# Non-Displacement of Employed Workers

---

## Q&A

# Compensation for Service

An organization which operates any Senior Corps program, shall not request or receive compensation from Senior Corps volunteers or from beneficiaries for services of Senior Corps volunteers. Furthermore, Senior Corps volunteers shall not request or receive compensation from service recipients, their legal guardians, family members, or friends.

However, voluntary contributions may be made by the community at large and volunteer stations may contribute to the financial support of the Senior Corps Program.

# Scenario Summary

## Background

- The Montgomery Foundation provides educational support services and sponsors a Foster Grandparent Program
- In the past six months, the program has become increasingly popular resulting in the need for additional staff, but the Foundation does not have available funds to cover the cost of additional volunteers

## Situation

- The Montgomery Foundation decided to host a fundraiser and asked each Foster Grandparent to contribute at least \$10

# Compensation for Service

---

## Q&A

# Labor

The sponsor shall not use grant funds directly or indirectly to finance labor or anti-labor organization or related activity.

A sponsor that employs laborers and mechanics for construction, alteration, or repair of facilities shall pay wages at prevailing rates as determined by the Secretary of Labor.

# Scenario Summary

## Background

- Several Foster Grandparents volunteer at a school where the teachers recently went on strike

## Situation

- The parents decide that the children and the Foster Grandparent should get together and make signs in support of the teachers' union
- The parents contact the sponsor to invite the volunteers and ask that the volunteers bring materials to make signs

# Labor

---

## Q&A

# Nondiscrimination

A sponsor or sponsor employee shall not discriminate against a Senior Corps volunteer on the basis of race, color, national origin, sex, age, religion, or political affiliation, or on the basis of disability, if the Senior Corps volunteer with a disability is qualified to serve.

# Scenario Summary

## Background

- Eduardo Jimenez is bilingual and is able to support the many Spanish speaking seniors in the area

## Situation

- Eduardo contacted the program director and told her that he was interested in becoming a Senior Companion
- The organization declined Eduardo's offer, explaining that though Eduardo is fluent in English, his accent may be difficult for clients, many of whom are hard of hearing, to understand

# Nondiscrimination

---

## Q&A

# Religious Activities

A Senior Corps volunteer or a member of the project staff funded by CNCS shall not give religious instruction, conduct worship services, or engage in any form of proselytization as part of his or her duties.

However, a volunteer station may continue to carry out its religious activities provided that it does not use CNCS funds to support such activities. These activities must be offered separately, in time or location, from the programs or services funded by Senior Corps.

# Scenario Summary

## Background

- Bakersview Christian Alliance is affiliated with a local church and serves as the sponsor for an RSVP project

## Situation

- RSVP meetings are held in the evening to avoid convergence with bible study classes and other faith-centered volunteer programs
- The RSVP program coordinator is a member of the associated local church, but many volunteers are not
- The RSVP coordinator reminds volunteers that proselytization is not appropriate during service activities

# Religious Activities

---

## Q&A

# Nepotism

Persons selected for project staff positions shall not be related by blood or marriage to other project staff, sponsor staff or officers, or members of the sponsor Board of Directors, unless there is written concurrence from the community group established by the sponsor and with notification to the CNCS

# Nepotism

---

## Q&A

# Failure to Comply

- If you use grant funds to engage employees or volunteers in any of the prohibited activities, you may be required to pay back grant funds, and could face more severe consequences.



# Summary

Remember that prohibited activities are divided into the following categories:

- Political activities
- Non-displacement
- Compensation
- Labor
- Nondiscrimination
- Religious activities
- Nepotism