

**Café: Managing Recovery Grants
Handout 2**



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Recovery Act Grants

To: AmeriCorps Recovery Fund Grantees

From: Peg Rosenberry, Director, Office of Grants Management

Subj: Clarifications and Recommendations for Administrating Recovery Act Grants

Date: July 9, 2009

This memo provides clarification on the requirements grantees must follow for Recovery Act grants and reminders of processes you must have in place to properly manage the funds. Also, OMB has issued its final guidance on reporting. You can access it at <http://www.recovery.gov/?q=node/579>. We will be scheduling technical assistance calls in the near future to discuss how best to gather the required data.

We are providing this additional guidance because Recovery Act funds must be tracked separately and cannot be co-mingled with your other AmeriCorps grants. Please make sure your subgrantees or operating sites also receive this guidance. If you have any questions about Recovery Act financial management and reporting requirements, your grants officer is ready to assist you.

Cost Allocation Plans: If you have costs that are general in nature that you will claim against both your current AmeriCorps grant and your Recovery Act grant, make sure you have written procedures in place to allocate the costs to each grant based on a reasonable plan. E.g. your regular AmeriCorps program has 50 members and your Recovery Act program has 10 members. Your allocation could be 5/6 of a particular cost to the regular AmeriCorps grant and 1/6 to the Recovery Act grant.

Time and Attendance: Many of you will need to revise your time-keeping systems to ensure staff charging time to both your regular AmeriCorps grant and your Recovery Act grant are recording those hours separately. Their timesheets should have separate columns or fields for each grant in which they record separate hours worked on each one. If the work they perform is not easily categorized by grant, you should include procedures for allocating staff costs in a cost allocation plan to ensure you claim the costs equitably across the two grants.

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Applicable Grant Provisions: While we have prepared separate AmeriCorps Recovery Act provisions, the applicable provisions for your 2008 (if you receive match replacement funds for your 2008 program) and 2009 programs also apply to the Recovery Act grants. Please note that the Recovery Act grant provisions do not include the following sections from the 2009 provisions, but they still apply to Recovery Act grants:

AmeriCorps Special Provisions, including provisions related to the Affiliation with the AmeriCorps National Service Network; Member Recruitment, Selection, and Exit; Supervision and Support; Release from Participation; Living Allowances, Other In-Service Benefits, and Taxes, and Member Records and Confidentiality; and Budget and Programmatic Changes.

AmeriCorps General Provisions, including provisions related to Responsibilities under Grant Administration; Financial Management Standards; The Office of Inspector General; Program Income; Safety; Non-discrimination Public Notice and Records Compliance; Grants Products; Suspension or Termination of Grant; Fixed Amount Award (Education Award Programs Only); and Trafficking in Persons. The Recovery Act grant provisions do not have the Grant Program Civil Rights and Non-Harassment Policy attachment.

Tracking Match Replacement Funds: If you received funds that you are using to cover some of your match costs in your 2008-09 or 2009-10 program, you will report them as the “Federal Share of Expenditures” on the FFR for your Recovery Act grant AND as the “Recipient Share of Expenditures” on your regular AmeriCorps grant. You must do this because the funds were provided for use in your existing program, but provided in a separate grant. If your fiscal staff have questions about this, please have them call your grants officer.

Timeliness of Grantee and Subgrantee Reporting: OMB provided strict guidance to federal agencies about due dates for reports. All reports must be submitted within 10 days of the end of the reporting period, i.e. October 10, January 10 and April 10. Please make sure both you and your subgrantees meet these deadlines.

Non-duplication and Non-displacement: Also, just a reminder that grantees are bound by the non-duplication and non-displacement provisions detailed at 45 CFR § 2540.100. If you are serving as the project sponsor and your employees are engaged in the same or substantially similar work as that proposed to be carried out by AmeriCorps members, and your employees are represented by a labor organization, you must obtain a written concurrence from the labor union, 45 CFR § 2522.100(c). All grantees must consult with local labor organizations representing employees of project sponsors prior to placing AmeriCorps members, 45 CFR § 2522.100(b).

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URL: http://www.nationalservice.gov/about/newsroom/commcenter_detail.asp?tbl_pr_id=1406