

## **CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS**

### **General Questions**

*Last update 4/15/21*

AmeriCorps 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 AmeriCorps' statute and regulations for applicable requirements.*

### **Information for Members and Volunteers:**

#### **1. May AmeriCorps designate AmeriCorps members or AmeriCorps Seniors volunteers as “essential workers”, or as otherwise eligible, for COVID-19 vaccine priority groups?**

No, AmeriCorps does not have the authority to designate AmeriCorps members or AmeriCorps Seniors volunteers as “essential workers”, or as otherwise eligible, for COVID-19 vaccine priority groups.

Neither members nor volunteers are considered employees at the organizations where they serve. However, to the extent possible, if a grantee is vaccinating employees in line with state and local guidance based on priority group designation, we recommend that they do the same for members who are engaged in the same or similar activities that would fall within the same designation.

Also, members and volunteers are encouraged to research and follow their state guidelines regarding vaccine distribution. **[updated 3/1/21]**

#### **2. May I leave my site for a compelling health reason, such as I have a compromised immune system?**

Yes, members and volunteers who are unable to serve at their assigned service location should work individually with their project sponsor and program to determine an appropriate alternative. Members/volunteers must notify their project sponsor/program about their risk to potential exposure. See CDC guidance for how to conduct a risk assessment of their potential exposure. **[updated 3/12]**



### **3. If I am serving in AmeriCorps NCCC or AmeriCorps VISTA, will AmeriCorps pay for the return to my Home of Record (HOR)?**

If you are unable to complete your service term, we will follow normal VISTA and NCCC program protocols for returning members to their Home of Records, where appropriate. **[updated 3/12]**

### **4. Can we teleserve?**

For AmeriCorps State and National and AmeriCorps VISTA members, please refer to the teleservice policies [AmeriCorps State and National Teleservice Guidance](#) and [AmeriCorps VISTA Teleservice Guidance](#). AmeriCorps Seniors grantees, please follow the appropriate guidance as outlined in the [Operations Handbook](#). **[updated 3/12]**

### **5. 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 AmeriCorps regulations 45 CFR § 2529.20, your lender is responsible for approving or denying your forbearance request. 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 4/10]**

### **6. 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 have successfully completed a term of service in an AmeriCorps program are eligible to have the National Service Trust (Trust) pay up to 100% of the interest that accrued on their qualified student loan 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.

For the AmeriCorps VISTA Program, if you successfully completed your term of service, the Trust will pay the interest accrued for the entire term of service. If you exited early from the VISTA program due to CPC, the Trust will pay the interest accrued during the days you were enrolled in the VISTA program before your early exit. If you exited the VISTA 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.

For AmeriCorps NCCC, if your graduation date was advanced and you were exited from the program earlier than planned due to COVID-19, the Trust will pay 100 percent of the interest that accrued on your qualified student loan for 1,700 hours of service. If you decided to exit the AmeriCorps NCCC program early and your exit was a resignation from the program, you are not eligible to have the Trust pay the interest that accrued.

**[updated 4/10]**

**7. AmeriCorps Seniors volunteers (SCP, FGP and RSVP volunteers) are not normally covered by state or federal unemployment benefits. Are AmeriCorps Seniors volunteers whose service ends due to COVID-19 covered by the Pandemic Unemployment Assistance benefit created by the CARES Act?**

Eligibility for Pandemic Unemployment Assistance is not determined by AmeriCorps. Please contact the government agency in your state that administers the Pandemic Unemployment Assistance benefit with any questions you may have regarding the benefit or contact the US Department of Labor. **[updated 5/18]**

**8. As an AmeriCorps Seniors volunteer whose service site has closed or who had to discontinue service due to COVID-19, can I get unemployment?**

As a general matter, AmeriCorps Seniors volunteers (SCP, FGP, and RSVP volunteers) are not eligible for unemployment because they are not employees. See 42 U.S.C. §§ 5055 (a), 5058, 12511 (30), and 12620 (a). To determine whether you qualify for Pandemic Unemployment Assistance, please contact the agency in your state administering the benefit. **[updated 5/28]**

**9. My service ended due to COVID-19, and I did not complete my full term of service, am I eligible for the one-time Pandemic Unemployment Assistance (PUA)?**



The U.S. Department of Labor (DOL) has indicated that AmeriCorps members who are no longer serving because their site is closed due to COVID-19 and suffered a loss of income are eligible for PUA. While [DOL's guidance](#) speaks to AmeriCorps members, DOL has not indicated that AmeriCorps Seniors volunteers who are no longer serving due to COVID-19 are eligible for PUA. **[updated 5/11]**

#### **10. How do I claim the Pandemic Unemployment Assistance?**

If you performed your AmeriCorps member service in the same state where you live, you may submit a PUA application with your state unemployment benefits office. **[updated 5/11]**

#### **11. What if I live in a different state than I was serving in? Which state do I apply for PUA?**

Contact your local state unemployment office to determine where you should apply for PUA. **[updated 5/11]**

#### **12. I successfully completed my full term of AmeriCorps service (e.g. my contract was for 1700 hours 10 months or 12 months, and I completed 1700 hours, or I successfully served all 12 months in my VISTA term of service) but have been unable to secure new employment. Am I eligible for the Pandemic Unemployment Assistance (PUA)?**

Generally, no. There is a limited list of exceptions to this, to include if you are the primary caregiver for children who cannot attend school or another facility because it is closed due to COVID-19, are unable to obtain employment because you have COVID-19, or you live with and are providing care for a family member who has COVID-19. You can find the [full list of exceptions here](#). **[updated 5/11]**

#### **13. I had a job offer for employment after graduation from AmeriCorps that was rescinded due to the impacts of COVID-19, am I eligible for PUA?**

Yes, per Sec. 2102(a)(3)(A)(ii)(I)(gg) of the CARES Act, if an AmeriCorps member completed his or her full term of AmeriCorps service and subsequently had a bona fide job offer but was unable to start due to a COVID-19-related disruption, then that individual is eligible for PUA. **[updated 5/11]**

### **Information for Grantees and Sponsors:**

#### **1. What should we share with our members/volunteers about Coronavirus/COVID-19?**

All of us can take measures to reduce the spread of COVID-19. Everyone can do their part to help respond to this emerging public health issue. The best source of COVID-19 resources is the [Centers for Disease Control \(CDC\)](#).



The CDC with the Department of Health and Human Services is the lead government agency on the management of the Coronavirus outbreak. They have created resource guides on preventing the spread of COVID-19 in specific communities. This includes specific guidance for childcare centers and schools, colleges and universities, community events, and first responders, among many others. These guides, along with additional resources and up-to-date information from the CDC, can be found at the following links. **[updated 3/12]**

- [CDC Coronavirus Hub](#)
- [Preventing COVID-19 Spread in Communities](#)

**2. I am an AmeriCorps State and National, AmeriCorps VISTA, or AmeriCorps Seniors grantee or project sponsor. Who should I contact with questions?**

AmeriCorps State and National, AmeriCorps VISTA, or AmeriCorps Seniors project sponsors should contact their Portfolio Manager. **[updated 3/12]**

**3. I am an AmeriCorps NCCC Project Sponsor. Who should I contact with questions?**

NCCC Project Sponsors should contact their NCCC Region campus staff with questions. **[updated 3/12]**

**4. What if a volunteer is showing symptoms of illness or respiratory problems? Should they stay home?**

Yes. Grantees and project sponsors should instruct volunteers to stay home, seek medical attention, and not return to their service sites. If a volunteer feels ill, is showing symptoms of illness, or thinks they may have COVID-19, they should be directed to consult with their health care providers. For further guidance, they should be directed to the [CDC guidelines](#). The decision whether to discontinue isolation should be made in consultation with their health care providers and federal, state, and local health departments. Grantees and sponsors should consistently apply and clearly communicate their policies regarding under what conditions they will instruct volunteers to self-quarantine. Grantees and project sponsors should also document when they have instructed a volunteer to stay home due to illness.

To prevent stigma and discrimination during service, do not make a determination to send a member or volunteer home based on race or country of origin. Also, grantees and sponsors must ensure that they maintain confidentiality of any member(s) and volunteer(s) who are believed, or confirmed, to have COVID-19, or other illnesses, as required by the Americans with Disabilities Act of 1990, as amended (ADA). **[updated 4/10]**

**5. What if a member or volunteer lives with or has been in close contact with someone known to have COVID-19? What should grantees and project sponsors do?**

Service members and volunteers who are well but live with, or have been in close contact with, someone who is known to have COVID-19 should promptly notify their respective program/project director. More importantly, the individual should self-report to their physician,



and in consultation with their physician, to the [state health department](#) responsible for the local management of COVID-19 issues.

The grantee or project sponsor should also refer to CDC guidance for [how to conduct a risk assessment](#) of their potential exposure. While maintaining confidentiality, the grantee or project sponsor should inform fellow service members and volunteers of their possible exposure to COVID-19 at the service site. **[updated 3/12]**

**6. Should my organization cancel planned congregate events (e.g.: training, recognition ceremonies or other special events)?**

Each organization should make the decision on whether to proceed with upcoming congregate events by consulting information from the Centers for Disease Control (CDC) and other relevant state and local agencies. A list of state and territorial health organizations can be found at the [CDC State Health Department Portal](#). **[updated 3/12]**

**7. Will AmeriCorps be cancelling upcoming trainings and convenings such as the AmeriCorps Seniors (formerly Senior Corps) Convening or upcoming AmeriCorps VISTA Sponsor Events?**

Yes, the agency has cancelled and/or postponed all meetings, convenings and events or is conducting them on line. The agency is monitoring the situation in locations where events are planned and will make a determination on whether to proceed with the advice and counsel of federal and local health officials for each jurisdiction. Grantees or project sponsors should continue to monitor the AmeriCorps website and other communication for updates. **[updated 3/12]**

**8. What if our organization has paid for staff, member, and/or volunteer travel that is canceled by the host organization or it is otherwise imprudent for the travel to happen as planned?**

Due to safety concerns, AmeriCorps would treat these scenarios like a weather-related travel cancellation and would allow the costs if they are otherwise reasonable and necessary. You should clearly document the reasons for the cancellation as they relate to the specific costs incurred. **[updated 3/12]**

**9. May members be exited for Compelling Personal Circumstances if they are unable to serve?**

Within AmeriCorps State and National, grantees determine compelling personal circumstances. Extended site closures and sustained disruptions could reasonably justify a compelling personal circumstances exit under [45 CFR § 2522.230 \(a\) Release for compelling personal circumstances](#). **[updated 3/12]**

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, or NCCC campus staff.



**10. 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 3/12]**

**11. If we have a member or volunteer who is exposed to or diagnosed with COVID-19, do we need to notify AmeriCorps?**

On a voluntary basis, please notify your Portfolio Manager if you have a member or volunteer who is diagnosed with COVID-19. Share the project name, city location and number of members or volunteers 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]**

**12. I understand that the Office of Management and Budget (OMB) granted relief to some provisions in 2 CFR 200, *Uniform Administrative Requirements, Cost principles and Audit Requirements for Federal Awards*. Does this apply to my organization?**

OMB has provided federal agencies with the discretion to provide their recipients with a number of flexibilities from 2 CFR 200 as a result of COVID-19. Those flexibilities are outlined in the following four memos below. Please note that the flexibilities within these memos have differing effective periods.

M-20-11 (issued 3/9/20): [Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\)](#) (Not rescinded by M-20-26 but expired 7/26/2020.)

M-20-17 (issued 3/19/20): [Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations](#) (Rescinded by M-20-26 with two exceptions, allowability of salaries and other project activities, extended through September 30; and extension of Single Audit submission (number 13 in M-20-17), extended through December 31)

M-20-20: (issued 4/9/20): [Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel Coronavirus \(COVID-19\)](#) (Rescinded by M-20-27.)

M-20-26 (issued 6/18/20): [Extension of Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations](#) and rescinded M-20-17 (with two exceptions) and M-20-20.



Of note, for M-20-26, awarding agencies, in their capacity as cognizant or oversight agencies for audit, may allow recipients and subrecipients that have not yet filed their Single Audits with the Federal Audit Clearinghouse as of March 19, 2020 that have normal due dates from March 30, 2020 through June 30, 2020 to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR § 200.501 -Audit Requirements, up to six (6) months beyond the normal due date. Audits with normal due dates from July 31, 2020 through September 30, 2020 will have an extension up to three (3) months beyond the normal due date. No further action by awarding agencies is required to enact this extension. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients should maintain documentation of the reason for the delayed filing. Recipients and subrecipients taking advantage of this extension would still qualify as a "low-risk auditee" under the criteria of 2 CFR § 200.520 (a)Criteria for a low-risk auditee. **[updated 8/24]**

### **13. What is the impact of COVID-19 on access to national service criminal history check (NSCHC) vendors Truescreen and Fieldprint, and how should programs handle Livescan location closures?**

As of March 18, 2020, agency-contracted national service criminal history check (NSCHC) vendors Fieldprint and Truescreen are operating. However, certain Livescan fingerprint locations may be closed due to business-specific reasons and/or local government requirements. To see which Livescan sites are closed, you may check site availability on <https://fieldprintcncs.com/>.

AmeriCorps communicates closely with Truescreen and Fieldprint and will issue further notice and guidance if closures become nationwide and/or the sources (FBI/states/NSOPW) become unable to provide results to grant recipients.

Livescan locations closed due to Covid-19 are allowing appointments to be scheduled for future dates. Grant recipients may elect to order fingerprint cards or schedule Livescan appointments for a future time when a local site expects to reopen. Scheduling an appointment or having documentation showing that the individual completed their fingerprint card satisfies the requirement to "initiate" the background check (i.e., the requirement that programs initiate the check before member/volunteer/staff begins work or service in a covered position).

The results of the NSOPW must be reviewed and documented *prior* to the person beginning work or starting service (before work, service, or training hours are charged to the grant, federal or match). A person may *not* accrue hours towards their work or service without first having cleared the NSOPW component of the NSCHC. Checks that are not within these time frames are noncompliant.



Please note: Grant recipients who use Truescreen need to refer to the Truescreen pre-approved ASP (<https://www.nationalservice.gov/CHCFAQs>). The criminal history information components (state of service check, state of residence check, and FBI checks) of the NSCHC must be initiated no later than the first day of the start of service or work. Checks that are not within these time frames are noncompliant.

Initiating state and FBI checks is going one step further than getting permission to conduct an NSCHC. This could include, for example, fingerprinting, sending requests to a state repository to get checks, or having candidates fill out official forms for getting the required checks. You must be able to document how and when checks were *initiated*. You must have policies and procedures outlining how you initiate checks and apply them consistently. **[updated 3/27]**

**14. Are members or volunteers or staff who are suspended for over 120 days, but not exited from service or employment, required to conduct a new National Service Criminal History Check?**

A break in service means that a person is no longer providing service through or receiving salary from a recipient or subrecipient. Temporary interruption of work or service without termination of employment or expiration of the agreement under which service is being provided is not a break in service.

With regard to members, volunteers, or staff suspended or not serving due to COVID-19, such temporary interruption is not a break in service and no new criminal history check needs to be conducted when the members or staff resume service. **[updated 3/19]**

**15. How is the requirement to accompany those for whom State and/or FBI check components are pending affected by COVID-19?**

Covid-19 has not changed the requirement to accompany those who are serving when State and/or FBI check components of the NSCHC are pending.

Individuals in covered positions are required to be accompanied during service or work while state check(s) or FBI check components are pending. A person is accompanied when he or she is in the physical presence of a person who is cleared for access to a vulnerable population.

One possible way to document accompaniment is to indicate on the covered person's timesheet

1. who accompanied during the covered individual's access to a person in a vulnerable population,
2. on what dates and hours the accompaniment took place, and



3. have the person who performed the accompaniment incrementally sign off and attest to the accuracy of the documentation.

You should have policies and procedures that clearly describe your accompaniment guidelines and documentation procedures. The documentation should show the day, times, accompanier and individual accompanied. If you need to amend the policy to reflect necessary adjustments due to the COVID-19 pandemic, your organization should document the change, and the organizational approval of the change.

For individuals who will be teleserving as a result of the COVID-19 pandemic, programs must ensure that communication with vulnerable populations includes accompaniment. This may be done via conference call, carbon copy on emails, or other means specific to the teleservice.

Please direct questions regarding NSCHC vendors or NSCHC access to [CHC@cns.gov](mailto:CHC@cns.gov).  
**[updated 3/27]**

**16. COVID-19 is impacting my organization's ability to prepare and submit a Federal Financial Report (FFR). Can I have an extension to submit my FFR?**

AmeriCorps recognizes that COVID-19 is significantly impacting operations for a number of our grantees and sponsors. The *reporting* period for all FFRs remains the same at this time. As always, AmeriCorps will consider requests for extensions on a case by case basis pursuant 2 CFR §§ 200.327. Additionally, all recipients must still submit their 272 reports to the Payment Management System on the required schedule or funds will be placed on hold. **[updated 4/13]**

**17. How should grantees manage subrecipient oversight monitoring given the impact of COVID-19 on scheduled monitoring compliance reviews?**

AmeriCorps recognizes the impact COVID-19 has had on grantee operations but grant recipients should continue their oversight of subawards to the extent possible. In fact, monitoring is particularly important during this time of disruption and uncertainty. Please monitor to the extent possible.

AmeriCorps' on-site monitoring visits are currently postponed. AmeriCorps monitoring plans are being modified to conduct virtual and remote monitoring activities. We recognize that grant recipients may also have to modify existing monitoring plans and procedures or postpone monitoring activities, due to circumstances that inhibit abilities to travel or conduct compliance assessments on-site.

Similar to documenting grant program exemptions or justifications due to COVID-19, grant recipients should document any internal decisions to modify monitoring plans. We can't stress enough how important it is that grantees document any and all deviations due to COVID-19.



This documentation is particularly important given the fact that grantees' usual means of documentation and document retention is being disrupted. We appreciate all your efforts and recognize that you are dealing with many unique challenges. **[updated 4/16]**

**18. If my organization receives a Small Business Administration (SBA) Paycheck Protection Program (PPP) loan, and it is used to cover the payroll costs of staff, can I reflect those payroll costs that were paid with PPP loan funds on my AmeriCorps or AmeriCorps Seniors grant budget as match funds?**

For FY 2019-2020, our agency has waived the match requirements for the following grants: AmeriCorps State and National program, Commission Support, Volunteer Generation Fund, and for all AmeriCorps Seniors programs. While currently there is no match requirement for these grants, match funds support expenditures that are tied to proposed outcomes, meaning that reduced match funds may result in reduced impact within the communities your grant serves. As a result, a grantee with a match waiver in FY 2019 and FY 2020 is encouraged to record all eligible match funds that they receive.

For AmeriCorps State and National program cost-reimbursement grants made under the authority of 42 U.S.C. §12571(a), and AmeriCorps Seniors grants staff whose salaries/wages are covered by SBA Paycheck Protection Program loans, SBA has made a general determination that those funds may be reflected as match funds, provided their expenditure is consistent with the authorized uses of PPP loan funds. For guidance on the permitted use of PPP funds, [please see here](#). For guidance on match funds, see 42 U.S.C. §12571(e)(5); 45 CFR 2521.45(b)(1); see also 42 U.S.C. 5048. Note, in your Federal Financial Report (FFR) you must reflect how much of your match funding for the AmeriCorps State and National program grant came from non-AmeriCorps federal sources, such as the SBA.

Please also note, the statutory language governing SIF and Commission Support grants specifically prohibits funds from other federal agencies be used as matched funding on those grant awards. 42 U.S.C. §§ 12576(a)(2), 12653k(i)(2)(A) and (k)(2).

For all other AmeriCorps and AmeriCorps Seniors grants, the national service laws do not provide express authority to use other federal funds as match. Therefore, unless the other agency's statute provides such authority, funds from other federal agencies may not be used as match funds. 2 C.F.R. § 200.306. **[updated 9/18]**

**19. If I received a Paycheck Protection Program (PPP) loan from the SBA, are there any potential issues?**

The [Paycheck Protection Program](#) (PPP) is a federal loan program, managed through the U.S. Small Business Administration (SBA). Rules and guidance concerning the PPP are [available on SBA's website](#) and specific technical assistance questions concerning the PPP should be directed to your lender and your legal counsel. AmeriCorps cannot provide guidance on



other governmental programs; however, here are several things to keep in mind should you apply for and receive a PPP loan:

1. If a grantee receives a PPP federally-guaranteed loan to cover staff costs instead of using its own funding, and later, the grantee seeks reimbursement for those same costs, the grantee should take care to ensure that the funds are properly accounted for and are not improperly duplicating or supplanting other funding.
2. Duplication is prohibited. Duplication occurs when a grant recipient uses federal funds to pay for specific costs associated with the grant that are already covered by other monetary sources. For example, if the grant recipient uses the PPP loan to pay the salary of a staff position, then charges agency funds to cover the *same* staff position, the grantee may have duplicated the costs for that position, or otherwise made an improper payment per 2 CFR 200.53. Please note that if a PPP loan is forgiven, in whole or in part, that does not cure any duplication. Furthermore, even if the PPP loan is paid back, there may still be a duplication issue.
3. Supplantation is prohibited. Supplantation occurs when a grant recipient replaces its state, local, or other federal funding sources with agency funding. However, assistance provided by AmeriCorps under the National Community Service Act of 1993, as amended (NCSA) may be used to supplement the level of state and local public funds expended for services of the type assisted under NCSA in the previous fiscal year. 42 U.S.C. §12633.

**[updated 9/18]**

## **20. Can a SIF award recipient use funds from a Paycheck Protection Program (PPP) loan as the SIF match requirement?**

No, 42 U.S.C. § 12653k(k)(2) states that matching funds are required by law to be non-federal cash, therefore federal PPP funds cannot be used for the SIF match See General FAQ # 18 above. **[updated 6/9]**

## **21. What are important reminders as we continue to receive flexibilities related to COVID-19?**

When the federal government makes additional flexibilities to handle major disasters or national emergencies, there is an increased opportunity for fraud, waste, and abuse. If you suspect or observe waste, fraud, and abuse, you must contact the AmeriCorps-OIG and your Program Officer/Portfolio Manager without delay.

The AmeriCorps-OIG maintains a hotline to receive this information about, or suspicions of, waste, fraud and abuse and can be reached by email at [hotline@cncsoig.gov](mailto:hotline@cncsoig.gov) or by telephone at (800) 452-8210. Upon request, AmeriCorps-OIG will take appropriate measures to protect the identity of any individual who reports misconduct, as authorized by the Inspector General Act of 1978, as amended. Reports to the AmeriCorps-OIG may also be made anonymously. More details are available in the FY 2020 General Terms and Conditions available [here](#).



Because of temporary changes in grant requirements, it is especially critical right now to ensure that eGrants has your current authorized representative and project director. We rely on this information to provide critical communications and oversight. We received a number of undeliverable messages following a recent communication. You can access eGrants and confirm your authorized representative and project director and/or make any changes [here](#).

As always, it is also critical that you retain documentation in accordance with all applicable record retention requirements that show you are using your funds on federal grants appropriately. This includes the federal share as well as any matching funds. Specific to flexibilities due to COVID-19, AmeriCorps' Office of Monitoring recognizes that grant recipients may experience challenges related to documenting grant program activities and expenditure changes due to COVID-19. If this occurs, grant recipients are encouraged to include a memo to the file that clearly describes the compliance limitations related to documentation, including applicable dates and references, Agency specific guidance (i.e. FAQs) that support the grant recipient's approach to documentation during this period. To assist in development of your memo to file, AmeriCorps recommends that the following details be included in your memo to the file, if applicable:

- Information, if available, from the sponsoring agency regarding restrictions of program operations. Include specific dates.
- Information regarding any local government orders, such as shelter in place, stay-at-home, or non-essential business closures. Include specific dates or local orders.
- Statement regarding what policies or procedures have been temporarily modified and a description of the changes.
- Indicate the timeframe for the change in policy or procedure.
- Project Director signature, if applicable and may be electronic, and date signed.

**[updated 8/24]**

## **22. May AmeriCorps designate members serving in AmeriCorps programs or AmeriCorps Seniors volunteers as “essential workers”, or as otherwise eligible, for COVID-19 vaccine priority groups**

No, AmeriCorps does not have the authority to designate AmeriCorps members or AmeriCorps Seniors volunteers as “essential workers”, or as otherwise eligible, for COVID-19 vaccine priority groups.

Neither members nor volunteers are considered employees at the organizations where they serve. However, to the extent possible, if a grantee is vaccinating employees in line with state and local guidance based on priority group designation, we recommend that they do the same for members who are engaged in the same or similar activities that would fall within the same designation.



Also, members and volunteers are encouraged to research and follow their state guidelines regarding vaccine distribution. **[updated 3/5/21]**

**23. If a grantee or sponsor makes available COVID-19 vaccines for their employees, can the sponsor include members or volunteers in any vaccination plans?**

AmeriCorps encourages grantees and sponsors to exercise flexibility and extend the opportunity to AmeriCorps members and AmeriCorps Seniors volunteers to participate in any vaccination plans, to the extent permissible by state guidelines. **[updated 3/5/21]**

**For more information, please visit:**

- [CDC Coronavirus](#)
- [U.S. Government Response to Coronavirus](#)

**24. Can a grantee, sponsor, or subsite require me to receive a vaccine for COVID-19 to serve onsite?**

AmeriCorps and AmeriCorps Seniors do not mandate vaccination for our members and volunteers to serve. However, whether a grantee, sponsor, or subsite may mandate vaccination for members or volunteers to serve on site is a determination for the sponsor to make, consistent with federal, state, and local law. The Centers for Disease Control (CDC) and the Equal Employment Opportunity Commission (EEOC) provide guidance applicable to the COVID-19 vaccination at the links provided below. If a grantee or sponsor does mandate vaccination, there may be medical or religious exemptions. Generally, grantees and sponsors are encouraged to follow state and local law, and CDC and EEOC guidance around workplace vaccination plans.

Updated as of March 5, 2021: [CDC: Workplace Vaccination Program](#)

Updated as of December 16, 2020: [EEOC FAQs: What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws](#) **[updated 4/15/21]**