

CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS AmeriCorps State and National Program Specific Questions

Last updated 02/11/2022

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 FAQs below 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. Your program should refer to AmeriCorps' 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 and 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](#).

AmeriCorps State and National Program Specific Question Groupings

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Alternative Program Activities

A1. 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 AmeriCorps permit service activities that are not included in approved notice of grant agreement, such as food delivery to families under quarantine? [updated 03/12/2020]

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 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.

A2. Is AmeriCorps 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? [updated 04/14/2020]

Yes, an email confirmation is required from an AmeriCorps Portfolio Manager before you start alternative activities. Once your program has the email confirmation, the AmeriCorps Portfolio Manager may request additional information, but your program's request for alternative member activities does not have to be completed before redirecting your program's members. Review of the alternative activities will be focused on ensuring no proposed activities are prohibited, unallowable, and/or 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. Please remember the terms and conditions also state: "While written approval from AmeriCorps is not required before making disaster-related programmatic changes, AmeriCorps reserves the right to limit or deny disaster-related programmatic changes, including disallowing costs associated with the disaster-related activities."

A3. 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? [updated 03/20/2020]

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 Portfolio Managers 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 your commission provides, the faster AmeriCorps will be able to provide approval.

The agency wants 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 Portfolio Manager 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.

A4. 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? [updated 03/20/2020]

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.

Teleservice

T1. Do you anticipate a change to the teleservice policy for AmeriCorps State and National members? [updated 02/10/2021]

Our agency 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.

Suspension

S1. Should programs suspend members from the program if service locations are closed? [updated 3/12/20]

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.

S2. 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? [updated 02/10/2021]

From the [CDC website](#):

“Employers should not require a COVID-19 test result or a healthcare provider's note for employees who are sick to validate their illness, qualify for sick leave, or to return to work. [...] be aware that healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner.”

The requirement to provide medical documentation is not an AmeriCorps State and National requirement. Thus, grantees may deviate from the medical documentation requirements in their policies and procedures about compelling personal circumstances (CPC), as long as they document at the time the decision is made that the deviation from the requirement was related to COVID-19 and the program makes a record that this health reason was beyond the member's control pursuant to [45 CFR § 2522.230](#) (for example, the member was exited for CPC because a sibling came in contact and the member did not want to possibly infect other program members).

S3. 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? [updated 05/08/2020]

In order to provide grantees the maximum flexibility as a result of COVID-19, AmeriCorps 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.

S4. When a member is suspended for COVID-19 reasons, can he or she continue to receive childcare and health care? [updated 04/07/2020]

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 childcare benefit (for up to 12 weeks) and health care benefit provided by the grant recipient. To prevent a lapse in childcare 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.

S5. What if a member's service cannot restart due to COVID-19? [updated 02/11/2022]

It would be the decision of the grantee as to whether the service is no longer practicable due to COVID-19 and thus whether member is suspended or exited.

Member Service Hours & Education Awards

M1. What qualifies as "no longer practicable due to COVID-19"? [updated 04/14/2020]

Under the CARES Act, when service is no longer practicable due to COVID-19, a member is required to exit. Such members may receive an education award consistent with the percentages specified in "[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?.](#)" 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.

AmeriCorps will rely on grant recipient certification when exiting the members that service is no longer practicable for, consistent with this guidance. Members who are not required by AmeriCorps to exit are not entitled to a full education award.

M2. May ASN members earn hours when their service sites are closed due to COVID-19? [updated 03/12/2020]

To earn hours, a member must engage in service activity pursuant to [42 U.S.C. §12602 \(a\)\(2\)](#). Accordingly, grantees may not give members constructive credit for hours that were not served. However, to the extent training or teleservice is possible that should be considered.

M3. 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? [updated 03/16/2020]

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."

M4. 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? [updated 12/17/2021]

Note: AmeriCorps programs may apply this flexibility to all members in service as of the effective date of the CARES Act or subsequently enrolled in the 2019, 2020, or 2021 program years, as indicated by the member's enrollment information in the My AmeriCorps Portal.

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 the example below:

Service Information

Program Name: Campus Compact AmeriCorps Program
Service Location: University of Northern Iowa
Hours of Service:
Service Start Date: Oct 16, 2019
Expected End Date: Oct 15, 2020
Completion Date:
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.

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

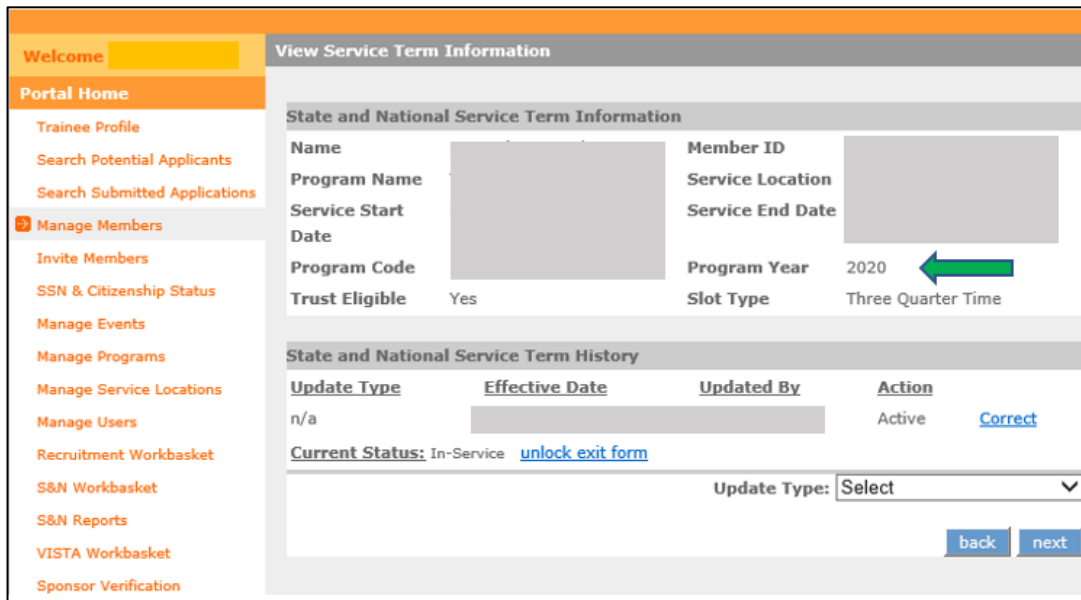
Programs/Subgrantees/Operating Sites will submit a report for their prime grant identifying:

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.
5. 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 AmeriCorps.

The prime grantee will not submit that information to AmeriCorps, but rather the documentation and approvals will be retained by the prime grantee and the programs/subgrantees/operating sites in member files.

M5. To which members may AmeriCorps programs apply an early exit due to COVID-19? [updated 09/07/2021]

AmeriCorps programs may apply this flexibility to all members in service as of the effective date of the CARES Act or subsequently enrolled in the 2019, 2020, or 2021 program years, as indicated by the member's enrollment information in the My AmeriCorps Portal. See below.



View Service Term Information

State and National Service Term Information

Name	Member ID
Program Name	Service Location
Service Start Date	Service End Date
Program Code	Program Year: 2020
Trust Eligible: Yes	Slot Type: Three Quarter Time

State and National Service Term History

Update Type	Effective Date	Updated By	Action
n/a			Active Correct

Current Status: In-Service [unlock exit form](#)

Update Type:

[back](#) [next](#)

M6. 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? [updated 12/17/2021]

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

1. Less than 15% SERVICE HOURS COMPLETED: NOT ELIGIBLE

AmeriCorps State and National members that have served less than 15 percent of the minimum required hours for the Term of Service at the time of exit are not eligible for a partial education award. These members are also not eligible for a full education award with a compelling personal circumstance exit related to COVID-19 pursuant to [45 CFR § 2522.230\(a\)\(2\)](#).

2. 15%-50% SERVICE HOURS COMPLETED: PARTIAL AWARD ELIGIBILITY POSSIBLE

AmeriCorps State and National members that have served between 15 and 50 percent of the minimum required hours for the Term of Service at the time of exit 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 pursuant to [45 CFR § 2522.230\(a\)\(2\)](#).

3. Greater than 50% SERVICE HOURS COMPLETED: FULL AWARD ELIGIBILITY POSSIBLE

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 of exit 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 pursuant to [45 CFR § 2522.230\(a\)\(2\)](#).

Note: AmeriCorps programs may apply this flexibility to all members in service as of the effective date of the CARES Act or subsequently enrolled in the 2019, 2020, or 2021 program years, as indicated by the member’s enrollment information in the My AmeriCorps Portal.

Program Impact

P1. 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? [updated 03/20/2020]

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 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. AmeriCorps 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 are a legitimate basis to request a GPR due date extension. Please contact your Portfolio Manager if you need to request an extension.

P2. 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? [updated 03/20/2020]

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 recompetitve grant application process.

P3. 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? [updated 05/08/2020]

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, AmeriCorps 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. AmeriCorps intends to be as flexible as possible when reviewing and assessing compliance with the Performance Measures. AmeriCorps will also not take any actions for failing to timely notify AmeriCorps that your program will not be able to meet the Performance Measures ([45 CFR § 2522.630](#); [2 CFR § 200.338](#)).

Grants Management

G1. 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? [updated 03/12/2020]

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.

G2. 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? [04/07/2020]

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.

G3. How will AmeriCorps determine the amount of funds a program may retain for an awarded full-cost, fixed-amount grant? [updated 4/14/20]

Per Section 3514(c) of the [CARES Act](#), AmeriCorps 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.

G4. COVID-19 is impacting my ability to meet my match requirements. Will AmeriCorps provide relief regarding this requirement? [updated 12/17/2021]

AmeriCorps is waiving all match requirements for all AmeriCorps State and National cost reimbursement grants that were awarded in FY 2019, FY 2020 and FY 2021. AmeriCorps utilized the authority to issue a blanket waiver under [42 U.S.C. § 12571\(e\)\(4\)](#) and is consistent with [45 CFR 2521.70](#) when AmeriCorps "determines that such a waiver would be equitable due to lack of available financial resources at the local level." AmeriCorps State and National grantees who wish to take advantage of this waiver in full or part do not have to take any action at this time. See the [FY 2022 Individual Match Waiver Overview and Process](#) for AmeriCorps State and National.

G5. COVID-19 is impacting my ability to secure local resources that will support agency and program goals and objectives. Since AmeriCorps is waiving all match requirements for all AmeriCorps State and National (ASN) cost reimbursement grants that were awarded in FY 2019, FY 2020, and FY 2021, can I submit a request to replace match funds that were previously accounted for and reported with federal grant funds? [updated 06/11/2020]

AmeriCorps recognizes the COVID-19 pandemic is affecting economic conditions in communities throughout the nation and that this lack of resources in a community adversely impacted by COVID-19

may prevent 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 budgeted match funds with federal grant funds for AmeriCorps and AmeriCorps Seniors projects that are active and have not surpassed the project end date.

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

AmeriCorps State and National 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 AmeriCorps monitoring activities. This is true for prime and subgrantees. Additionally, please refer to the program-specific terms and conditions to determine whether these actions must be approved by AmeriCorps. Further, every effort should be made to maintain the same level of service that was funded.

G6. 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? [updated 02/11/2021]

If you cannot meet the submission deadline for the Federal Financial Report, you must request an extension from your 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. AmeriCorps 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 FRR due date extension. Please contact your Portfolio Manager if you need to request an extension.

G7. 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? [updated 05/28/2020]

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 CFR §200.333](#). AmeriCorps will require that full-time fixed amount grant programs that do not have this required documentation return the appropriate funds to AmeriCorps.

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.

General COVID-19 FAQs

The following ASN COVID-19 FAQs were removed on Feb. 11, 2022, due to the information being duplicative of the AmeriCorps General COVID-19 FAQs. For these answers and updates, please reference the [AmeriCorps General COVID-19 Questions](#). **[updated 02/11/2022]**

- If we have a member who is exposed to or diagnosed with COVID-19, do we need to notify AmeriCorps?
- May members be exited for Compelling Personal Circumstances (CPC) if they are unable to serve?
- Will I still qualify for interest accrual benefits if I was prevented from completing my full term of service due to COVID-19?
- 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?

Archived ASN COVID-19 FAQs

The following ASN COVID-19 FAQs were removed on February 11, 2022, due to the information being addressed in other active AmeriCorps State and National COVID-19 FAQs or the information is no longer applicable to the current pandemic climate (i.e. access to vaccines). **[updated 02/11/2022]**

- May AmeriCorps designate AmeriCorps members or AmeriCorps Seniors volunteers as "essential workers," or as otherwise eligible for COVID-19 vaccine priority groups?
- If a grantee or sponsor makes available COVID-19 vaccines for their employees, can the sponsor include members or volunteers in any vaccination plans?
- What if a member's service cannot re-start due to COVID-19?
- Is an AmeriCorps Portfolio Manager's 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?
- 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?
- Is AmeriCorps 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?