Effective practices for SCP grants management.

Summary: This document provides ideas and suggestions for effective practices in operating and managing many aspects of SCP grants.
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# CHANGE LOG

This table lists all changes made in the most recent revision of this document. See [SCP-Pervious Change Logs 2017-2021](#) for a full list of changes since January 2017. See Appendix D. 3 for changes made in the 2022.

<table>
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<td>• Update links throughout document. AmeriCorps and AmeriCorps Seniors resources have been transferred from NationalService.gov to AmeriCorps.gov. As documents and pages are updated, this document is also updated.</td>
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The Corporation for National and Community Service (CNCS) [As of September 29, 2020 will be known as AmeriCorps] is an independent, federal grant-making government agency whose mission is to improve lives, strengthen communities, and foster civic participation through service and volunteering. For 25 years, AmeriCorps—through its programs: AmeriCorps Seniors, AmeriCorps, and Volunteer Generation Fund (VGF)—has helped to engage millions of citizens in meeting community and national challenges through service and volunteer action. AmeriCorps provides grants to national and local nonprofits, schools, government agencies, faith-based and other community organizations and other groups committed to strengthening their communities through volunteering.

This AmeriCorps Senior Companion Program (AmeriCorps Seniors SCP) Operations Handbook (Handbook) provides ideas and suggestions for effective practices in operating and managing many aspects of local AmeriCorps Seniors SCP projects. It is a technical assistance document and not a compliance guide. Many of the suggestions refer to specific sections of the federal regulations that govern AmeriCorps Seniors SCP, but the Handbook does not address all issues covered in the regulations. Sponsors and project directors are required to follow the AmeriCorps Seniors SCP Federal Regulations, published in Title 45, Chapter XXV, Part 2551, of the Code of Federal Regulations (CFR). Sponsors and project directors with concerns or questions with respect to compliance should first consult the federal regulations, the terms and conditions of the grant award, and, if necessary, contact the appropriate Portfolio Manager.

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Washington, D.C. 20525
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TTY: (202) 606-3472
www.AmeriCorps.gov

Upon request, this material will be made available in alternative formats for people with disabilities.
1 INTRODUCTION AND OVERVIEW

1.1 PURPOSE OF HANDBOOK
This Handbook has been developed for the use of sponsors of AmeriCorps Seniors SCP (Senior Companion Program) projects, including executive directors or their designees, AmeriCorps Seniors SCP project directors and other project staff, advisory council members, and others involved in managing local projects.

For further guidance on fiscal, programmatic, budgetary, and administrative matters, sponsors and project directors should consult the AmeriCorps Seniors SCP Program Regulations, the Terms and Conditions on the AmeriCorps Seniors SCP grantee page of the sponsor’s Notice of Grant Award (NGA), or their portfolio manager.

If there is a conflict between the contents of this Handbook and the federal regulations or the Terms and Conditions of the NGA, the regulations governing the grant, or the Terms and Conditions of the NGA are the controlling authority.

1.2 HANDBOOK DESIGN
The Handbook is organized into a series of chapters that are designed to provide sponsors and project staff with ideas and suggestions for operating their AmeriCorps Seniors SCP projects. At the end of many of the chapters, a series of Effective Practices is presented that may help a sponsor implement a program locally. It is expected that sponsors and project directors will use these ideas to stimulate their own creative thinking and adapt the suggestions to meet their own local needs.

Further, many parts of the Handbook refer to specific sections of the regulations that govern AmeriCorps Seniors SCP in the SCP Program Regulations, but the Handbook in no way replaces these regulations. Sponsors who want to clarify official policies should refer to the Terms and Conditions listed in the Notice of Grant Award (NGA) and any official policy guidance issued by AmeriCorps Seniors.

This handbook will be updated periodically.

1.3 AMERICORPS OVERVIEW
In 1993, the Corporation for National and Community Service (CNCS) was established under the National and Community Service Trust Act of 1993 to connect Americans of all ages and backgrounds with opportunities to give back to their communities and their nation. It merged the work and staffs of two predecessor agencies, ACTION and the Commission on National and Community Service.

At its inception, CNCS was directed to manage three main programs:

- Senior Corps, which incorporated the Foster Grandparent, Senior Companion and RSVP programs
• AmeriCorps, which incorporated the longstanding VISTA program, the new National Civilian Community Corps program, and the full-time demonstration program that had been established under the National and Community Service Act of 1990
• Learn and Serve America, formerly known as Serve America. In 2011, this program was eliminated from the CNCS budget and portfolio of programs.

As of September 29, 2020, CNCS and Senior Corps have been rebranded, AmeriCorps and AmeriCorps Seniors, respectively.

Today AmeriCorps serves more than 5 million individuals of all ages and backgrounds help meet local needs through a wide array of service opportunities. These include projects in six priority areas: disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families through AmeriCorps’s core programs: AmeriCorps and AmeriCorps Seniors.

AmeriCorps is part of our nation’s history of commitment to building a culture of citizenship, service, and responsibility. For more information on the history of AmeriCorps see the National Service Timeline. See Appendix A.7 for common acronyms.

1.3.1 AMERICORPS TRANSFORMATION AND SUSTAINABILITY PLAN
As CNCS, now AmeriCorps, approached its 25th anniversary, it implemented the Transformation and Sustainability Plan. The plan is to incorporate improvements to better support the field and position national service for greater impact and growth for the next 25 years and beyond. Developed after months of review and incorporating ideas from staff, grantees, sponsors, previous Administrations, the Inspector General and GAO, and other stakeholders, the plan expanded access, improve customer service, strengthen community impact, build long-term sustainability, and position national service for future growth.

Specific steps the agency has and will continue to take in the Transformation and Sustainability Plan are:

• Ensuring its core business functions are accountable and effective
• Make it easier for organizations and individuals to participate in programs
• Align its workforce and workplaces to better serve its customers, meet evolving needs, and ensure efficient use of public funds
• Strengthen its impact in communities by prioritizing evidence-based models

The plan makes AmeriCorps more efficient, effective, and accountable to better serve our customers, meet the needs of the Nation, and be responsible stewards of taxpayer dollars. For additional information and updates on the Transformation and Sustainability Plan please see its page.

1.3.2 AMERICORPS SENIORS
Each year AmeriCorps Seniors taps the skills, talents, and experience of persons age 55 and older to meet a wide range of community challenges through three programs: RSVP, the Foster Grandparent Program, and the Senior Companion Program. AmeriCorps Seniors volunteers in RSVP recruit and manage other volunteers, participate in environmental projects, mentor and tutor children, deliver meals to the homebound and respond to natural disasters, among many other activities. AmeriCorps
Seniors volunteers in the Foster Grandparents Program serve one-on-one as tutors and mentors to young people with special or exceptional needs. AmeriCorps Seniors volunteers in the Senior Companions program help adults maintain independence in their homes.

Through grants and other resources—including the energy and efforts of citizens age 55 and over—AmeriCorps Seniors helps meet the needs and challenges of America’s communities.

- **AmeriCorps Seniors RSVP**

  Since 1971, AmeriCorps Seniors RSVP, one of the largest volunteer efforts in the nation for people 55 and over, has matched older adults who are willing to help with local organizations on the front lines of meeting community needs. AmeriCorps Seniors RSVP projects link the skills of the volunteers with the identified needs of the community. AmeriCorps Seniors volunteers in RSVP do not receive any monetary incentive or stipend, but the project may reimburse volunteers for certain out-of-pocket costs associated with their service activities. In addition, volunteers receive accident, personal liability, and excess automobile liability insurance as well as community recognition.

- **AmeriCorps Seniors Foster Grandparent Program**

  Since 1965, the AmeriCorps Seniors Foster Grandparent Program has provided one-on-one mentoring, nurturing, and support to children with special or exceptional needs, or who are in circumstances that limit their academic, social, or emotional development. AmeriCorps Senior volunteers in FGP serve from 5 to 40 hours a week and receive hourly stipends. Volunteers must be age 55 or older and meet established income eligibility guidelines. In addition to the stipend, they receive accident, personal liability, and excess automobile liability insurance; assistance with the cost of transportation; recognition; and, as feasible, meals during their assignments.

- **AmeriCorps Seniors Senior Companion Program**

  Since 1974, AmeriCorps Seniors volunteers in Senior Companion Programs have made a difference by providing assistance and friendship to adults who have difficulty with daily living tasks, such as shopping or paying bills. Their assistance helps these adults retain their dignity and remain independent in their homes rather than having to move to more costly institutional care. AmeriCorps Seniors serve from 5 to 40 hours a week and receive hourly stipends. They must be age 55 or older and meet established income eligibility guidelines. In addition to the stipend, they receive accident, personal liability, excess automobile liability insurance coverage; assistance with the cost of transportation; recognition; and, as feasible, meals during their assignments.

1.3.3 **AmeriCorps Seniors SCP: Purpose and Goals**

- **Purpose**

  Under the authority of the [Domestic Volunteer Service Act](https://www.americorps.gov), AmeriCorps Seniors provides grants to qualified agencies and organizations to engage persons 55 and older in volunteer service by providing companionship to ease loneliness and social isolation, assist with transportation and light chores, help to serve as eyes and ears to professionals who can intervene in the case of medical or other deterioration on the part of the clients, and give support to informal caregivers.
Goals

AmeriCorps Seniors volunteers in SCP provide companionship and support to other adults in need of extra assistance to remain at home or in the community for as long as possible. Achievement of AmeriCorps Seniors SCP’s purpose is facilitated by the coordination of the resources of AmeriCorps, the AmeriCorps Seniors SCP sponsor, and the community to fulfill the following goals of AmeriCorps Seniors SCP:

1) Develop opportunities for older people willing to share their experience, abilities, and skills for the betterment of their community and themselves to help older adults in their communities maintain independence and to provide respite for caregivers.

2) Ensure that volunteer assignments are consistent with the interests and abilities of the volunteers and the needs of the community served.

3) Ensure that volunteers are provided needed orientation, in-service instruction, individual support and supervision, and recognition for their volunteer service.

4) Provide reasonable opportunity for community and volunteer involvement and support in development, operation, and appraisal of the AmeriCorps Seniors SCP project.

5) Develop local support to supplement available federal sources and ensure that program expenditures are incurred at the lowest possible cost consistent with the effective operation of the project, as required by AmeriCorps Seniors’ legislation.

6) Cooperate with agencies and organizations involved in the fields of aging and volunteerism.

7) Develop a sound, locally controlled senior volunteer program with continuing community support.

1.3.4 HISTORY OF AMERICORPS SENIORS SCP

The 1960 White House Conference on Aging highlighted the need for all older people to stay active which could be done through service to their country. The conference led to the passage of the Older Americans Act of 1965 under which several pilot demonstration programs were initiated including the Foster Grandparent and Senior Companion Programs.

While the Foster Grandparent Program was developed in 1965, it was not until 1968 that the Senior Companion Program began as a demonstration project at the Administration on Aging, Department of Health, Education and Welfare, with a goal for low-income older adults to help their more frail peers remain independent in their homes.

In 1971 President Nixon created the ACTION agency to provide coordination of all government sponsored volunteer programs and in 1973, he asked Congress to expand the role of low-income older volunteers to provide person-to-person services and the Senior Companion Program was officially launched.

In 1993, the Corporation for National and Community Service was established, merging the work and staffs of two agencies: ACTION; and the Commission on National and Community Service. The mission of CNCS at the time was to connect Americans of all ages and backgrounds with opportunities to give back to their communities and their nation.

On April 21, 2009, President Barack Obama signed the Edward M. Kennedy Serve America Act, which reauthorized and expanded national service programs administered by the CNCS. It also
lowered the age eligibility from 60 to 55 and increased income eligibility to 200% of the poverty level.

On January 31, 2019, updated program regulations became effective for all three Senior Corps programs. The regulations updated and eliminated many regulations that had become outdated and burdensome within the context of current programming. For the Senior Companion Program, most notably, the regulations changed the volunteer service hour requirement to at least five (5) hours weekly or 260 hours annually and reduced the minimum requirement of ongoing in-service training annually from 40 hours to 24 hours.

1.3.5 AMERICORPS
Since its founding in 1994, AmeriCorps engages Americans in intensive service at nonprofits, schools, public agencies, and community and faith-based groups across the country tackling pressing problems and mobilizing millions of volunteers for the organizations they serve through three programs: AmeriCorps State and National, AmeriCorps VISTA, and AmeriCorps NCCC (National Civilian Community Corps). AmeriCorps members recruit, train, and supervise community volunteers, tutor and mentor youth, build affordable housing, teach computer skills, clean parks and streams, run after-school programs, help communities respond to disasters, and build the capacity of nonprofit groups to become self-sustaining, among many other activities. In exchange for a term of service, members earn a living allowance and a Segal AmeriCorps Education Award that can be used to pay for college or graduate school, or to pay back qualified student loans.

1.4 RESOURCES OF AMERICORPS

1.4.1 Office of the Inspector General (OIG)
The OIG is an independent and objective office established to help improve AmeriCorps’s programs and operations, including the AmeriCorps Seniors Programs. It has the responsibility of keeping the Corporation’s CEO and the Congress informed about any problems and deficiencies relating to AmeriCorps programs and operations. The OIG carries out this role by conducting and supervising audits and investigations that promote economy and efficiency, as well as prevent and detect fraud, waste, and abuse in AmeriCorps’s programs. The OIG also coordinates AmeriCorps’s relationship on these types of matters with other organizations, including Federal, state, and local law enforcement agencies.

When to Contact the OIG: The OIG should be promptly contacted whenever information is discovered that indicates that there has been waste, fraud, abuse, or any violation of criminal law at a program or at a sub-recipient.

Contacting the OIG

The OIG will accept confidential referrals of fraud, waste, and abuse in AmeriCorps Seniors or other AmeriCorps programs.

Written notifications should be submitted to:

Inspector General
AmeriCorps
250 E Street, SW, Washington, D.C. 20525

By Phone: (202) 606-9390 or the OIG toll-free Hotline: (800) 452-8210

Via email: hotline@cncsoig.gov
1.4.2 Office of Government Relations and Strategic Engagement

1.4.2.1 Major Functions

The Office of Government Relations and Strategic Engagement (OGRSE) coordinates communications, branding, and outreach and engagement efforts for AmeriCorps and its programs. The staff works closely with other offices and departments to enhance and support efforts to reach out to external audiences. It serves as a resource for AmeriCorps Seniors grantees to help them to amplify their own stories.

OGRSE maintains a “one-stop shop” for grantee communication needs, which, among other items includes:

- A Communications Toolkit, including templates;
- The AmeriCorps and AmeriCorps Seniors Branding Guide
- An event registration link for you to easily share any and all events you host
- A link to submit photos;
- Links to current Fact Sheets

If you are planning an event or announcement, need sample materials, or need assistance or advice, please contact OGRSE at pressoffice@cns.gov.

1.4.2.2 AmeriCorps Websites

OGRSE, with support from other departments, maintains the AmeriCorps website. AmeriCorps.gov has pages dedicated to each of our programs and initiatives. For ease of discovery, you can reach these pages using the domain names Americorps.gov/seniors and AmeriCorps.gov. The pages are designed to help customers, including program grantees and other stakeholders, get the information they need as easily and quickly as possible so they can focus their energies on serving community needs.

These sites recognize the power of the national service network through stories from service participants, news from the field, program spotlights and best practices. Other features include:

- Search function across all sites
- Phone directory of AmeriCorps staff
- Stories of service
- Latest news & blogs from the field
- Photo library
- Best practices
- Program spotlights
- Interactive guides for finding the “Right Program” (for organizations and individuals)
- Service calendar
- Forms library
- FAQs
- Connections to AmeriCorps Social Media sites (Facebook/Twitter/YouTube)

Ordering AmeriCorps Publications

AmeriCorps Seniors projects can obtain OGRSE materials and publications through online ordering.

Communication resources and media kit materials are available on the national service website.

Program logos can be found on the AmeriCorps logo webpage
Finding what you need on the AmeriCorps websites:

Here are some of the most frequently asked questions from organizations working with or seeking to work with AmeriCorps Seniors, with links to their answers:

- Where can I find out about AmeriCorps funding opportunities?  
  Funding Opportunities

- I’m having trouble using the electronic grants system. Where do I go for help?  
  The eGrants Helpdesk / National Service Hotline

- Where can I find training and technical assistance information?  
  Litmos  
  Research and evaluation resources

- I am a current grantee. Where can I find AmeriCorps Seniors grant application instructions and supporting materials?  
  AmeriCorps Seniors Senior Companion Program grantees

- Where can I find the Terms and Conditions for my grant award?  
  Terms and Conditions Webpage

- Where can I find information about required National Service Criminal History Checks?  
  National Service Criminal History Checks

- Where can I find information about days of service?  
  Events

- Where can I find information about the changes in the OMB Circulars?  
  Uniform Guidance

- I work for a faith-based organization. Are we eligible to apply for AmeriCorps grants?  
  Faith-Based and Neighborhood Partnerships

- I’m interested in promoting your programs to my organization’s constituents. Where can I order brochures or other promotional materials?  
  Grantee Resources  
  Communication resources  
  Branding Guidelines for Grantees

- How do I find AmeriCorps programs in my own community?  
  National Service in Your State

- I’m a grantee and am looking for AmeriCorps photos to use in our brochures. Where can I find them?  
  AmeriCorps Flicker gallery  
  Communication Resources
Where can I find resources for working with Veterans and Military Families?

Veterans and Military Families

1.4.2.3 Partnerships and Program Support

OGRSE develops and manages partnerships and alliances that strengthen the impact and broaden the reach of national service. It is authorized to solicit and accept private donations which support AmeriCorps programs and initiatives. Additionally, OGRSE takes the lead in producing many events connected to the agency’s signature projects such as the Martin Luther King, Jr. Day of Service, AmeriCorps Seniors Week, the September 11th National Day of Service and Remembrance, National Service Recognition Day, and AmeriCorps Week.

National and Community Service Initiatives

- AmeriCorps encourages participation in community-wide service activities. OGRSE works with AmeriCorps programs to support both our signature projects such as MLK Day of Service, as well as other national service initiatives like the September 11th National Day of Service and Remembrance, and AmeriCorps Seniors Week, and AmeriCorps Week. These annual national service activities provide opportunities to reach out to both traditional service partners and grantees and organizations with which projects might like to form new partnerships.

- MLK National Day of Service is a day of service that reflects Dr. King’s life and teaching-- bringing people together around a common bond of service to others. Responding to a 1994 Congressional charge, the Corporation, now AmeriCorps, engages Americans across the country to celebrate the King Holiday in a way that reflects his proposition that “everybody can be great because everybody can serve.” National service grantees lead communities in making it a day on, not a day off and answering Dr. King’s important question, “What are you doing for others?” In keeping with Dr. King’s teachings, AmeriCorps promotes service that leads to better economic justice for all. AmeriCorps provides grants to support service projects that reflect Dr. King’s life and teaching.

- AmeriCorps Seniors Week is an annual recognition week designed to salute volunteers from AmeriCorps Seniors programs Foster Grandparents, Senior Companion and RSVP, recognize community partners, and communicate the impact of and on the lives of those who serve and who are served. AmeriCorps Seniors Week is the ideal time to promote the continuing contributions of older adults to communities. *AmeriCorps Seniors Week will not be held in 2021, instead, AmeriCorps Seniors will highlight AmeriCorps Seniors projects during May, Older Americans Month.

- September 11th National Day of Service and Remembrance is the culmination of efforts originally launched in 2002 by the 9/11 nonprofit MyGoodDeed with wide support by the 9/11 community and leading national service organizations. This effort first established the inspiring tradition of engaging in charitable service on 9/11 as an annual and forward-looking tribute to the 9/11 victims, survivors, and those who rose up in service in response to the attacks.

- National Service Recognition Day is an annual recognition where mayors, county, and tribal officials hold public events to highlight the value of national service to their cities and counties. This initiative is held in collaboration with the National League of Cities, National Association of Counties and Cities of Service.


AmeriCorps Seniors Senior Companion Program Operations Handbook Chapter 0: 1 Introduction and Overview

- **AmeriCorps Week** is an annual recognition week designed to bring more Americans into service, thank AmeriCorps members and alumni for their powerful impact, and thank the community partners that help to make service possible. AmeriCorps Week is an ideal time to promote the depth and breadth of the national service family. In 2016, AmeriCorps will enroll its one millionth member.

**Training and Technical Assistance**

The **Knowledge Network** at is AmeriCorps’s “one-stop shopping” site for tools, training, and information about volunteering and national service. The Knowledge Network provides quick and easy access to training and technical assistance resources for national service programs.

Following is a summary of available features on the Knowledge Network:

- **AmeriCorps Seniors SCP grantee Resources**
  This landing page provides access to the most up-to-date training and technical assistance materials developed for AmeriCorps Seniors SCP program.

- **National Service Criminal History Checks**
  Under the National and Community Service Act of 1990, as amended by the Serve America Act (SAA), all grantees must conduct National Service Criminal History Checks. AmeriCorps Seniors volunteers in SCP and Senior Companion projects are required to conduct checks on participants and project employees. AmeriCorps Seniors RSVP’s are required to conduct checks on project employees. In addition, grantees are required to maintain specific documentation verifying successful completion and adjudication of criminal history checks.

  This landing page provides an exhaustive list of requirements, guidance and resources aimed at all AmeriCorps Seniors programs including FGP, SCP and RSVP.

- **Financial Management Resources**
  Organizations need to handle funds wisely. This may include developing written policies and procedures, internal controls, and budget controls. AmeriCorps Seniors grantees also need to be familiar with documenting in-kind donations, time and activity reporting, generally accepted accounting principles (GAAP), AmeriCorps Seniors regulations, and OMB circulars. Some of our most relevant resources related to this topic can be found on this page.

- **Performance Measurement**
  AmeriCorps' Performance Measurement framework provides a common focal point for AmeriCorps's work across all programs and initiatives. AmeriCorps has a focused set of agency-wide measures derived from the 2011-2015 Strategic Plan and each AmeriCorps Seniors program contributes to them. This page provides access to common core curricula as well as to each program’s specific measures, requirements, and associated resources.
• **Litmos**

Litmos is AmeriCorps’ online learning management system. It contains dozens of interactive online courses for AmeriCorps Seniors grantees. It also contains recordings of all live webinars offered by AmeriCorps Seniors. Course topics include financial management, performance measurement, evidence-based programming, approaches to tutoring and mentoring, independent living, responding to the opioid epidemic and much more. To sign up for an account:

1. Visit this page in any web browser: [https://americorpsonlinecourses.litmos.com/self-signup/](https://americorpsonlinecourses.litmos.com/self-signup/)
2. Enter the required information.
3. In the Code field, enter: SC-FGP if you represent an AmeriCorps Seniors Foster Grandparent Program, SC-RSVP if you represent an AmeriCorps Seniors RSVP Program or SC-SCP if you represent an AmeriCorps Seniors Senior Companions Program.
4. Click “Register.”
5. **If you are affiliated with two different AmeriCorps Seniors programs** (for example, if your sponsor has both an AmeriCorps Seniors RSVP and a Senior Companion Program), enter only one code at first. After you hit “Register” the first time, visit [https://americorpsonlinecourses.litmos.com/self-signup/](https://americorpsonlinecourses.litmos.com/self-signup/) again, fill out the form in full, and enter the code for the second program only. Use the same email address both times to avoid duplicating your account.
6. You’re in! Consider taking a minute to view the [AmeriCorps Seniors Litmos Orientation](#) before moving on. You can come back at any time to explore more and take any courses that interest you.

• **New Project Curricula**

AmeriCorps Seniors has created two in-depth curricula to aid Senior Companion programs that are new to AmeriCorps Seniors, both of which can be found in Litmos. They offer an interactive introduction to everything you need to know to begin working with AmeriCorps Seniors and include activities to help you get to know your grant, AmeriCorps and the resources available to you in more depth. They were originally created for organizations that received their first AmeriCorps Seniors grant, but much of the content is relevant to any individual who has joined an AmeriCorps Seniors program, even if it has been in existence for some time.

You can take the curricula as a whole, or just use individual modules to brush up on specific topics. Be sure to watch the introductory videos to learn more about how you can make the most of them:

- **The AmeriCorps Seniors SCP New Project Curriculum** introduces you to the basic requirements of running an AmeriCorps Seniors grant, helps you understand how those requirements and strategies apply to your specific grant, and points you to resources and tools you can use to make your job easier.
The AmeriCorps Seniors SCP Financial Management Curriculum introduces you to the basic financial and accounting requirements and strategies for running an AmeriCorps Seniors grant, helps you understand how those requirements and strategies apply to your specific grant, and points you to resources and tools you can use to make financial management easier.

Email serviceresources@cns.gov for Litmos technical support.

AmeriCorps Research and Evaluation

The Office of Research and Evaluation (R&E) advances the mission of AmeriCorps’s programs, including the AmeriCorps Seniors programs, by building knowledge about the effectiveness of national service, social innovation, civic engagement, and volunteering as solutions to community needs. R&E also works to improve the decision-making of AmeriCorps Seniors, its grantees, and the field through the use of scientific research methods. This is accomplished by supporting AmeriCorps grantees, offices, and programs in the measurement of performance and results, embedding evidence throughout the development and implementation of their work, and shaping key policy decisions using credible data.

Research efforts supported by R&E include:

- The Volunteering and Civic Life in America report is issued by AmeriCorps and the National Conference on Citizenship and shows that service to others continues to be a priority for millions of Americans.

- Evidence Exchange: a digital repository of research, evaluation reports, and data focusing on national service, social innovation, civic engagement, and volunteering. The purpose of this repository is to provide our grantees, our partners and, most importantly, communities across America easy access to this information. AmeriCorps Seniors specific reports and reports on issues relevant to AmeriCorps Seniors are available.

- Evaluation Resources: Evaluation is the use of social science research methods to assess a program’s design, implementation, and effectiveness. It is a tool that helps programs continuously improve their work and demonstrate what they are accomplishing in communities. This page contains a number of resources to assist your program as it moves through each stage of the evaluation process.

The Electronic Grants System

The electronic grants system is an online system designed to automate the entire grants and project management process from application to closeout. It serves as the official system of record and maintains the Notice of Grant Awards which include the terms and conditions of the grant award.

Sponsors use the electronic grants system to:

- Submit and track grant applications including certifications and assurances, amendments, continuations and renewals
- Submit Federal Financial Reports, Project Progress Reports and other required reports
Portfolio managers use the electronic grants system to:

- Review applications and reports,
- Award and manage grants efficiently and effectively.

The electronic grants system Help Desk can be reached at:

**Phone:** 1-800-942-2677  
**Online:** National Service Hotline.

### 1.4.3 The Federal Register

AmeriCorps Seniors programs are governed by law and administrative rules or regulations. Making and amending government regulations is controlled by the White House’s Office of Management and Budget. Notices of proposed regulations must be published in the *Federal Register* for public comment.

Published every Federal working day, the *Federal Register* is the official gazette of the United States Government. It provides legal notice of administrative rules and notices and Presidential documents in a comprehensive, uniform manner. Visit the Federal Register for free online access to its publications.

#### Code of Federal Regulations

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government. It is divided into 50 titles that represent broad subject areas of federal regulation. Each volume of the CFR annual edition is updated once each calendar year. The 50 subject matter titles contain one or more individual volumes, which are updated once each calendar year, on a staggered basis.

Each title is divided into chapters, which usually bear the name of the issuing agency. Each chapter is further subdivided into parts that cover specific regulatory areas. Large parts may be subdivided into subparts. All parts are organized in sections, and most citations in the CFR are provided at the section level (such as 45 CFR 2551.21). A list of agencies and where they appear in the CFR may be found in Appendix C of the *U.S. Government Manual*. AmeriCorps is found in Title 45, Chapters XII and XXV. The regulations governing AmeriCorps Seniors SCP are in Chapter XXV, Part 2551, which is typically cited as “45 CFR 2551.”

The online CFR or “eCFR” provides the public with enhanced access to Government information and is a convenient way to access the latest version of the program regulations incorporating all amendments. In the eCFR, the latest versions of the regulations and their amendments are available online.

**Electronic Code of Federal Regulations – the eCFR**

The eCFR is a current, daily updated version of the Code of Federal Regulations (CFR). The eCFR is a convenient way to access the latest version of the regulations incorporating all amendments. Regulations cited in this Handbook are linked to the eCFR.

As of September 29, 2020, CNCS and Senior Corps are doing business as AmeriCorps and AmeriCorps Seniors, respectfully. The eCFR will continue to use the legal names CNCS and Senior Corps.
amended sections are identified with the date of their publication and a reference to the volume of the Federal Register where they were published.
2 PROJECT OPERATIONS

2.1 ELIGIBILITY, AWARDS, AND SPONSORSHIP

2.1.1 Sponsor Eligibility
The AmeriCorps awards federal AmeriCorps Seniors SCP grants to public agencies, Indian Tribes, and secular and faith-based private non-profit organizations in the United States, that have authority to accept and the capacity to administer AmeriCorps Seniors SCP projects.

2.1.2 Solicitation of Proposals
When federal AmeriCorps Seniors SCP grants are available, AmeriCorps conducts a grant competition. A Notice of Funds Availability (NOFA) is issued when funding for a grant competition has been appropriated by Congress or a Notice of Funding Opportunities (NOFO) is issued when funding for a grant competition is anticipated but not yet available. The NOFA or NOFO may also be referred to as the “Notice” in application related instructions. Any eligible agency or organization may apply for an AmeriCorps Seniors SCP grant. Notices are posted at AmeriCorps Funding Opportunities & Resources and at the Funding Opportunities on AmeriCorps website AmeriCorps.gov. Notices will be shared broadly through national and local networks.

2.1.3 Submission of a Grant Application
Grant applications are submitted in the AmeriCorps electronic grants system (eGrants). Applications are submitted following the Notice instructions and using the forms included on the Funding Opportunities. The application must be submitted by a representative of the sponsor who is authorized by its governing body to certify that all data in the application are true and correct, the application has been duly authorized by the governing body of the applicant, and the applicant will comply with the Assurances submitted with the application, if the assistance is awarded.

2.1.4 “Self-Sponsored” Projects
In some situations, project staff, advisory councils, boards, or other interested persons, have incorporated as an independent non-profit organization and successfully competed to become a sponsor. These so-called “self-sponsored” projects must meet all the administrative and programmatic requirements associated with sponsorship addressed in the program regulations. AmeriCorps neither encourages nor discourages self-sponsorship but recommends that groups considering this option fully explore the advantages and disadvantages applicable to their situation and consult with other organizations who have taken this step. Contact your portfolio managers for further information.

2.2 SPONSOR RESPONSIBILITIES

2.2.1 Regulations Requirements
The sponsor is legally responsible for fulfilling all project management responsibilities necessary to accomplish the purposes of the program and may not delegate or contract these responsibilities to
another entity. Sponsor responsibilities are listed in 45 CFR 2551 Subpart B of the AmeriCorps Seniors SCP regulations. A few key responsibilities are listed here:

1) Focus AmeriCorps Seniors Senior Companion Program resources on critical problems that affect frail older adults and other adults with special needs within the project service area and in compliance with AmeriCorps performance measure requirements.

2) Ensure that National Service Criminal History Checks are conducted according to AmeriCorps’s requirements and the sponsor’s written policy for every AmeriCorps Seniors volunteer and covered staff (see National Criminal Checks Resources webpage and Chapter 8 for further details).

3) Assess, in collaboration with other community organizations or through utilization of an existing assessment, the needs of the client population in the community and develop strategies to respond to those needs using AmeriCorps Seniors volunteer resources.

4) Develop and manage one or more volunteer stations to provide placement opportunities that appeal to persons age 55 and over by:

   a) Ensuring that a volunteer station is a public agency, Indian Tribe, or non-profit private organization, whether secular or faith-based, or an eligible proprietary health care agency, that has the capacity to serve as a volunteer station. Proprietary health care organizations are for-profit health care organizations that serves one or more vulnerable populations (45 CFR 2551.12). AmeriCorps defines vulnerable populations in its grant terms and conditions to include children age 17 or younger, persons age 60 and older, and/or individuals with disabilities. Individuals with disabilities are defined as having a physical or mental impairment which substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment. Refer to Chapter 6 for more information about volunteers at health care agencies and volunteer stations.

   b) Ensuring the placement of AmeriCorps Seniors volunteers is governed by a Memorandum of Understanding (MOU) between the sponsor and each volunteer station. (See Preparation of the Memorandum of Understanding in Chapter 6, for more information.)

   c) Complying with and ensuring that all volunteer stations comply with all applicable civil rights laws and regulations, including non-discrimination based on disability and providing reasonable accommodation where appropriate. (See Appendix A.2, Primer on Civil Rights Compliance.)

   d) Developing service opportunities to support locally identified needs of eligible clients in a way that considers the skills and experiences of AmeriCorps Seniors volunteers and meets the performance outputs and outcomes approved in the grant application.

5) Make special efforts to recruit and place into AmeriCorps Seniors volunteer service individuals from diverse races, ethnicities, sexual orientations, or degrees of English language proficiency, Veterans and military family members, persons with disabilities, and hard-to-reach populations and groups in the community which are underrepresented in the project. The sponsor should stress the recruitment and enrollment of persons not already volunteering.
6) Provide AmeriCorps Seniors SCP volunteers with:

   a) Assignments that show direct and demonstrable benefits to clients, the community served, the AmeriCorps Seniors volunteers, and the volunteer station;

   b) Required cost reimbursements specified in 45 CFR 2551.46, including insurance, transportation, and recognition of their service, and the elective cost reimbursements of meals, uniforms, and physical exams.

   c) A minimum of 20 hours of pre-service and at least 24 hours annually of in-service training (45 CFR 2551.23(f)).

7) Secure community participation in local project operation by establishing an advisory council. (See Chapter 4, Community Participation, for additional information.)

8) Provide levels of staffing and resources appropriate to accomplish the purposes of the project and carry out its project management responsibilities.

   a) Employ a full-time project director (except as otherwise negotiated with AmeriCorps Seniors) to accomplish program objectives and manage the functions and activities delegated to project staff for AmeriCorps Seniors program(s) within its control (45 CFR 2551.25(c)). (See Chapter 5, Project Staff, for more information). 

   b) Establish recordkeeping and reporting systems in compliance with AmeriCorps Seniors requirements that ensure quality of program and fiscal operations, facilitate timely and accurate submission of required reports, and cooperate with AmeriCorps Seniors evaluation and data collection efforts.

   c) Conduct criminal history checks on all grant-funded staff, in accordance with the requirements in 45 CFR 2540.200–207.

   d) Consider all project staff as sponsor employees subject to its personnel policies and procedures (45 CFR 2551.25(d)).

   e) Compensate project staff at a level that is comparable with similar staff positions in the sponsor organization and/or project service area, as is practicable (45 CFR 2551.25(e)).

   f) Establish risk management policies and procedures covering project and AmeriCorps Seniors volunteer activities. This includes but is not limited to policies and procedures on criminal history checks of staff and volunteers, and the provision of appropriate insurance coverage for AmeriCorps Seniors volunteers, vehicles, and other properties used in the project.

   g) Establish written service policies for AmeriCorps Seniors volunteers that include but are not limited to annual and sick leave, holidays, service schedules, termination, appeal procedures, meal and transportation reimbursements and document that volunteers have received program policies.

   h) Conduct an annual appraisal of volunteers' performance and annual review of their income eligibility.
i) Ensure that appropriate liability insurance is maintained for owned, non-owned, or hired vehicles used in the project.

j) Assume full responsibility for securing maximum and continuing community financial and in-kind support to operate the project successfully.

9) Ensure that the official sponsor and project information in AmeriCorps electronic grants system (eGrants) is accurate, including the legal names of the sponsor organization and the project; the names of the sponsor’s authorized representative and the project director; and their respective post office addresses, e-mail addresses, and phone numbers.

10) Encourage the most efficient and effective use of AmeriCorps Seniors volunteers by coordinating project services and activities with related national, state and local programs, including other AmeriCorps programs.

2.2.2 Fund Raising Limitations – Uniform Guidance

The sponsor assumes full responsibility for securing maximum and continuing community financial and in-kind support to operate the project successfully. Certain government-wide requirements apply to fund raising under AmeriCorps Seniors SCP grants.

AmeriCorps Seniors sponsors must follow all applicable OMB Cost Principles, as stated in the Terms and Conditions of your grant award.

All AmeriCorps Seniors SCP grant awards are subject to the Uniform Administrative Requirements, OMB Cost Principles, and Audit Requirements for Federal Awards located at 2 CFR Part 200 and AmeriCorps’s implementing regulation at 2 CFR Part 2205 (hereinafter, the Uniform Guidance). Award recipients must read, understand, and implement these requirements.

2.2.3 Relinquishment

If an AmeriCorps Seniors SCP sponsor determines they are no longer able to administer the project they should contact their portfolio managers as soon as possible. The portfolio managers will work with the sponsor for an orderly relinquishment and close-out of the grant.

To begin the relinquishment, process the sponsor will be asked to send a letter to their portfolio managers formally giving notice of their decision to relinquish the grant and the effective date of the relinquishment. The portfolio manager will forward the letter to the Director of AmeriCorps Seniors. The portfolio manager will provide the sponsor with template letters to send to volunteers, volunteer stations, and advisory council members. The portfolio manager will set-up a meeting with the sponsor to review the status of the grant funds for close-out. The project will be responsible to complete final project and financial reports.

2.2.4 Subsequent Requirements

The sponsor must also abide by any subsequent laws, Executive Orders, or relevant regulatory directives, including special conditions that may be prescribed for the project. The sponsor may establish additional policies not covered by, and not contradictory to, AmeriCorps policies.
2.3 SPECIAL LIMITATIONS INCLUDING PROHIBITED ACTIVITIES

The following are special limitations, including prohibited activities, to which AmeriCorps Seniors SCP sponsors and projects are subject. Project sponsors must have written policies in place to ensure compliance with the list below. In the event of a question as to the application of the following limitations, contact the appropriate portfolio manager.

2.3.1 Political Activities [45 CFR 2551.121(a)] and 45 CFR 1226

1) No part of any grant may be used to finance, directly or indirectly, any activity to influence the outcome of any election to public office, or any voter registration activity.

2) No project may be conducted in a manner involving the use of funds; the provision of services, space, or facilities; or the employment or assignment of personnel in a manner that identifies the project with:

   a) Any partisan or nonpartisan political activity associated with a candidate, or contending faction or group, in an election; or

   b) Any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election; or

   c) Any voter registration activity except that voter registration applications and nonpartisan voter registration information may be made available to the public at the premises of the sponsor. But in making registration applications and nonpartisan voter registration information available, employees of the sponsor and volunteers may not express preferences or seek to influence decisions concerning any candidate, political party, election issue, or voting decision.

3) No AmeriCorps Seniors SCP volunteer or employee of a sponsor or volunteer station may take any action, when serving in such capacity, with respect to a partisan or nonpartisan political activity that would result in the identification or apparent identification of AmeriCorps Seniors SCP with such activity.

4) The sponsor may not use grant funds for any activity that influences the passage or defeat of legislation or proposals by initiative petition. In other words, there is a prohibition against using AmeriCorps Seniors SCP grant funds for lobbying activities.


2.3.2 Restrictions on State or Local Government Employees [5 U.S.C. 1501, 1502 & 1503]

If the sponsor is a state or local government agency with a grant from AmeriCorps, certain restrictions contained in Chapter 15 of Title 5 of the United States Code are applicable to persons who are principally employed in activities associated with the project. The restrictions are not applicable to employees of educational or research institutions. Employees subject to these restrictions may not:

1) Use their official authority or influence for the purpose of interfering with or affecting the result of an election or nomination for office; or
2) Directly or indirectly coerce, attempt to coerce, command, or advise a state or local officer or employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes; or

3) Be a candidate for elective office, except in a nonpartisan election. (“Nonpartisan election” means an election in which none of the candidates is to be nominated or elected as representing a political party any of whose candidates for Presidential elector received votes in the last preceding election at which Presidential electors were selected.)

2.3.3 Religious Activities [45 CFR 2551.121(g)]

1) AmeriCorps Seniors SCP volunteers and project staff funded by AmeriCorps may not give religious instruction, conduct worship services, or engage in any form of proselytization as part of their duties.

2) A sponsor or volunteer station may retain its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, if it does not use AmeriCorps Seniors funds to support any inherently religious activities, such as worship, religious instruction, or proselytization, as part of the programs or services funded. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under AmeriCorps Seniors SCP.

2.3.3.1 Transportation Assignments

While AmeriCorps Seniors SCP may not provide religious instruction, conduct worship, or proselytize as part of service, volunteers may drive a client or beneficiary to a religious service, provided this activity is part of the volunteer’s service activity description. A volunteer may remain with a client who is attending a religious service if the activity is part of the agreed upon volunteer assignment. In other words, if an AmeriCorps Seniors SCP volunteer and the client would like the volunteer to accompany the client to a religious service as part of the volunteer’s service activity, and if the AmeriCorps Seniors SCP volunteer is not responsible for conducting a religious service, the volunteer is not engaged in prohibited activity. The volunteer, though, cannot lead any part of the religious service.

2.3.4 Non-Discrimination [45 CFR 2551.121(f)]

For purposes of this regulation, any program, project, or activity to which AmeriCorps supported volunteers are assigned is deemed to be receiving federal financial assistance. (See Appendix A.2, Primer on Civil Rights Compliance, for more information.)

1) A sponsor or sponsor employee may not discriminate against an AmeriCorps Seniors volunteer, or with respect to any activity or program, on the basis of race, color, national origin, gender, age, religion, sexual orientation, disability, gender identity or expression, political affiliation, marital or parental status, or military service.

2) Sponsors are encouraged to take affirmative action to overcome the effects of prior discrimination. Even in the absence of prior discrimination, a sponsor may take affirmative action to overcome conditions which resulted in limited participation.
2.3.5 Labor and Anti-Labor Activity [45 CFR 2551.121(d)]

No grant funds may be directly or indirectly used to finance labor or anti-labor organization or related activity.

2.3.6 Non-Displacement of Employed Workers and Non-Impairment of Contracts for Service [45 CFR 2551.121(b) and 45 CFR 1216]

An AmeriCorps Seniors volunteer may not perform any service or duty or engage in any activity which would otherwise be performed by an employed worker or which would supplant the hiring of or result in the displacement of employed workers or impair existing contracts for service. See 45 CFR 1216.1.1 – 1216.1.4 Non Displacement of Employed Workers and Non-Impairment of Contracts for Service for the AmeriCorps regulations on this subject. These regulations list certain exceptions.

2.3.7 Prohibition on Fee-for-Service [45 CFR 2551.121(c)]

Under no circumstances may an AmeriCorps Seniors volunteer receive a fee for service from service recipients, their legal guardian, members of their family, or friends. No person, organization, or agency may request or receive any compensation for services of AmeriCorps Seniors volunteers.

As set forth in Section 404(c) of the Domestic Volunteer Service Act of 1973 (DVSA), there is a general prohibition against grantees and volunteer stations requesting or receiving any compensation for the services of AmeriCorps Seniors volunteers. This prohibition is sometimes referred to as the “fee-for-service” prohibition. Section 404(c) provides the following:

*(c) Compensation of supervising agencies or organizations*

_No agency or organization to which volunteers are assigned hereunder, or which operates or supervises any volunteer program hereunder, shall request or receive any compensation from such volunteers or from beneficiaries for services of volunteers supervised by such agency or organization._

In some cases, determining whether a payment requested or received by a grantee or volunteer station is permissible in light of the prohibition is relatively straightforward. In other cases, however, making determinations as to whether the arrangement is permissible in light of the prohibition requires a more in-depth review, including an assessment by AmeriCorps. More Guidance on Prohibition of Fee-for-Service Activities, including examples, can be found in _Appendix A.12_. If you have questions about fee-for-service contact your portfolio managers.

2.3.8 Nepotism [45 CFR 2551.121(h)]

Persons selected for project staff positions may 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 Advisory Council and with notification to AmeriCorps.

2.3.9 Volunteer Status [45 CFR 2551.45]

AmeriCorps Seniors volunteers are not employees of the sponsor, the volunteer station, AmeriCorps, or the Federal Government.
2.3.10 Fair Labor Standards [45 CFR 2551.121(e)]

A sponsor that employs laborers and mechanics for construction, alteration, or repair of facilities must pay wages at prevailing rates as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended, 40 U.S.C. § 276a.
2.4 **EFFECTIVE PRACTICES IN PROJECT OPERATIONS**

**Ensuring that the Sponsoring Organization Takes a Leadership Role**

Effective practices include:

A. The sponsor values the project as an integral part of its organizational vision and operations by:

1. Communicating the importance of the project to its Board, staff, and volunteers;
2. Ensuring that the project has adequate administrative and fiscal support;
3. Playing an active role in promoting the project and its contributions to the community;
4. Meeting regularly with media, political leaders, funders, civic groups, and others to promote awareness of and support for the project; and
5. Maintaining communication with portfolio managers and attending state and regional training events where feasible.

B. The sponsor provides strong project leadership by:

1. Employing a project director who demonstrates strong leadership skills in working with project and sponsor staff, volunteers, volunteer stations, and the project’s Advisory Council;
2. Establishing and, with the project director, maintaining strong working relationships with related community agencies, organizations, and leaders;
3. Ensuring that sponsor’s leadership and the project director establish and maintain a good working relationship based on clear communication and mutual support;
4. Designating a member of the staff who has clearly defined responsibilities for project oversight and support; and
5. Developing and maintaining clear lines of reporting between project staff and the sponsor representative.

C. The sponsor has written policies and procedures in place to ensure oversight of the project and compliance with federal rules and regulations that address topics like:

1. National Service Criminal History Checks and special limitations including prohibited activities;
2. Establishing and updating Memoranda of Understanding with sponsor stations;
3. Fiscal management and internal controls related to management of AmeriCorps Seniors SCP project;
4. Documentation of data management systems related to tracking project outcomes, demographics, and other performance indicators in order to verify and validate data used to meet reporting requirements.
3 PERFORMANCE MEASUREMENT AND EVIDENCE-BASED PROGRAMMING

3.1 AMERICORPS PERFORMANCE MEASUREMENT INITIATIVE

Older volunteers have a tremendous amount of knowledge, skill, and experience to contribute to our communities through the enriching investment of service. Through the application of performance measurement, we balance the need to implement service projects that are fulfilling to volunteers and beneficial to communities served with the demand to demonstrate results and improve project design.

Honoring the intent and vision of the 2009 Serve America Act, AmeriCorps has established a set of national performance measures. These measures allow all programs to use common terms, definitions, and approaches to measurement and make it possible to tell the story of national service with confidence.

*AmeriCorps’s national performance measures* reflect six programming priorities or focus areas which include: Disaster Services, Economic Opportunity, Education, Environmental Stewardship, Healthy Futures, Veterans and Military Families, and Capacity Building. AmeriCorps Seniors allows projects to select measures from each of these areas following a performance measurement framework that is detailed in the Notice of Funding Opportunity (NOFO). This framework is subject to change. Specific measures are identified in the NOFO and Appendix B on the *AmeriCorps Seniors SCP grantee* webpage.

3.1.1 PERFORMANCE MEASUREMENT BASICS

Performance measurement is the ongoing, systematic process of tracking your program’s outputs and outcomes. *Outputs* refer to the amount of service provided. They measure the completion of activities and document the fact that individuals received services, products were created, or programs were developed. *Outcomes* reflect the changes or benefits that occur. Outcomes can reflect changes in individuals, organizations, communities, or the environment. This may include changes in attitudes, knowledge, behavior, or condition.

*Why measure performance?*

One reason is accountability. Performance measurement satisfies the need of funders and stakeholders (including AmeriCorps participants, board members, community members, staff and clients, and taxpayers) to see that the program or project is getting results. Performance measurement helps you communicate achievements in a way that funders and stakeholders will find meaningful and compelling.

Another reason to measure performance is to determine if the change you thought would happen with your intervention is actually occurring. Performance measurement is a systematic way to collect reliable information about the intervention’s implementation and progress toward outcomes.

You can also use performance measurement data to spot and correct problems. Are you reaching the population you intended? Do some people require more or less intensive service to show a positive
outcome? Even when an intervention is implemented exactly as planned, performance measurement can help you find ways to strengthen the intervention to make it more effective.

Performance measurement is a way to get feedback, so you know if your intervention is making the expected difference, and helps you decide how to make the most effective use of your limited resources. Performance measurement also allows you the opportunity to promote the excellence of your program.

3.1.2 THEORY OF CHANGE

A Theory of Change is used in performance measurement to describe why a change is expected to happen given a set of circumstances. It helps you map out why a specific series of service activities or intervention will lead to expected outcomes.

A theory of change has three main elements:

- Community need
- Intended outcome
- Specific intervention or set of service activities

As you develop a theory of change for an issue that your program will address, you identify where you are now, as well as the change for which you are programming. You will choose certain activities and define the amount of service required to bring about the desired outcomes.

A strong theory of change presents statistics to document the community need and includes evidence that supports the cause and effect relationship between the intervention and outcome.

3.1.3 PERFORMANCE MEASURE WORK PLANS

Performance measure work plans are used by AmeriCorps Seniors grantees to explain the design of their programs and the goals they expect to reach.

All existing AmeriCorps Seniors grantees as well as applicants for new funding identify performance measures in work plans in their grant applications. For the specific requirements, see the instructions for the grant application on the AmeriCorps Seniors SCP Grantee Resources page.
The elements of the work plan are:

**Community Need.** This is the priority community issue or problem that the AmeriCorps Seniors volunteers’ service activities will address. The need should be measurable and include current and reliable sources to establish the compelling nature of the need. The need should be described in enough detail to convey its importance, the consequences of it going unmet, and why AmeriCorps Seniors volunteers can be an effective resource to meet it. It should be described clearly to people unfamiliar with your community.

**Service Activity.** The service activity is the task that the volunteers will perform. The service activity is selected from a menu of pre-defined options.

**Service Activity Description.** The service activity description should indicate how much service is necessary to achieve the output and outcome selected. It should include who the beneficiaries are, and what the AmeriCorps Seniors volunteers will be doing with them. It should outline how often AmeriCorps Seniors volunteers will provide the service, for how long, and where the service will take place.

**Output.** These are the immediate results or products of the services provided by the AmeriCorps Seniors volunteers. Accomplishments tell what was done in some quantified fashion. They include the number of persons helped, the amount of something that was created, the number of times an activity was performed, and the extent to which a program or service was expanded.

**Output Instrument.** This is the tool that will be used for data collection. The instrument is selected from a menu of pre-defined options.

**Output Instrument Description.** The instrument description provides an outline of the data collection plan and schedule. It should include a brief description of who will collect the data, from whom, and when it will be collected.
Outcome. These are the measurable changes in the community, persons served, or agency that occurred as a result of the service activity. Impacts or outcomes are measures of effectiveness of the program in the community or with those served, or they are measures of cost-effectiveness which show how much money or other resources the service activity saved in the community.

Outcome Instrument. This is the tool that will be used for data collection. The Instrument is selected from a menu of pre-defined options.

Outcome Instrument Description. The instrument description provides an outline of the data collection plan and schedule. It should include a brief description of who will collect the data, from whom, and when it will be collected.

3.1.4 IMPLEMENTING PERFORMANCE MEASUREMENT WORK PLANS

To implement performance measures, work plans, see the instructions for completing work plans and identifying performance measures found in the AmeriCorps Seniors Grant Application. Additional guidance, measurement instruments, and other resources are available on the AmeriCorps Seniors SCP Grantee page in Resource section. For questions, contact your portfolio manager.

Projects are held accountable for their actual performance against specified targets. With respect to each performance measure, grantees will be expected to:

1) Report on progress achieved;
2) Make the underlying documentation of performance available for review; and
3) Report on any operational changes and project improvements that resulted from information learned from the performance data.

Experience has shown that clear expectations with stations greatly enhance grantees’ ability to effectively collect the data that allows for performance measurement. Such expectation is often documented in the Memorandum of Understanding or a data sharing agreement. A sample data sharing agreement is available in Appendix. A.13.

3.2 EVIDENCE BASED PROGRAMMING

Federal agencies, educational institutions, non-profits, and others often discuss the evidence behind program models in an attempt to understand what works and what does not. AmeriCorps Seniors is joining this national conversation.

Our programs have long used evidence to support their understanding of whether the service provided is having its intended effect. Now, we seek a deeper understanding of the evidence that supports our program models recognizing that programs may have supporting evidence that exists along a continuum.
3.2.1 Key Terms

Evidence-informed program. A program design based on academic research or program evaluations is properly referred to as evidence informed. For example, a program developer might use research on the development of reading skills or the physical activities that increase bone density to develop a program.

Evidence-based program. The term “evidence-based program,” in general, refers to a set of activities and practices supported by a theory of change tested through rigorous program evaluations. These evaluations have demonstrated a causal relationship between program activities and specified outcomes, typically through one or more quasi-experimental or experimental field tests.

Evidence-based program model. A program model is a set of activities and practices supported by an explicit theory of change, resulting in specified outcomes. The specificity of essential elements in an evidence-based program model varies. However, evidence-based program models should address:

- Amount of contact or service over a period of time (“dosage”)
- Characteristics of service recipients/communities served
- Methods of quality assurance
- Training of professional staff and supporting volunteers
- Standard procedures or curriculum
- Monitoring for fidelity to program model
Replication. Replicating an evidence-based program with fidelity to the model means that essential elements of the service activity has been implemented as described in the evidence-based program model and that adaptations are relatively minor.

For an explanation of how evidence based programming aligns with AmeriCorps efforts to ensure volunteers are engaged in work that has an impact on volunteers and their communities (including evidence-informed programming, performance measurement, and evaluation) see the Evidence Exchange and AmeriCorps Seniors SCP Grantee page.

3.2.2 Evidence-Based Programs and Registries
AmeriCorps Seniors maintains a list of evidence-based programs and registries of both programs and research that may be relevant to its grantees in Appendix A.11 to this handbook. This list is not necessarily comprehensive, and AmeriCorps Seniors will add additional programs and registries to this list as it becomes aware of them. If you would like to inform AmeriCorps Seniors of a potential addition to this list, please share with your portfolio manager.
4 COMMUNITY PARTICIPATION

4.1 LOCAL OWNERSHIP

AmeriCorps Seniors SCP projects are community-based projects supported by federal funds for the dual purpose of engaging persons 55 and older in volunteer service to meet critical community needs; and to provide a high-quality experience that will enrich the lives of volunteers. In order to accomplish this, AmeriCorps Seniors programs have a responsibility to partner with organizations in the local community to:

- Build public awareness of and support for the program within the community;
- Recruit and place volunteers to enhance the capacity of organizations and institutions within the community;
- Work to integrate senior service into the activities of other service programs within the community;
- Work toward common goals in local communities, complementing and reinforcing each other’s contributions through activities related to Days of Service, Strategic Initiatives, and other local service initiatives.

Community participation is generated by individuals, groups, organizations and other national service programs. A project can garner community support through volunteer stations, local funding sources, civic and service clubs, the media, friends and family of volunteers and those with whom they work, other programs of the sponsor, schools, private non-profits, businesses, community leaders, and others who value the activities, accomplishments and impacts of the project and the volunteers.

4.2 AMERICORPS SENIORS SCP ADVISORY COUNCIL

4.2.1 Program Requirement

The scope and extent of participation by the many entities that make up a community will vary considerably from project to project. However, all projects can benefit from the involvement of a focused and sustained core group that provides perspective and active assistance from the service area. The sponsor determines how this core group participation shall be secured, consistent with the provisions of the program regulations (45 CFR 2551.24). For the sake of easy reference, this core group is referred to as the advisory council. If the sponsor has a board that meets the purposes and requirements of all applicable AmeriCorps Seniors SCP program regulations (see 45 CFR Part 2551), it is permissible for some or all of the members of that board to also serve on the AmeriCorps Seniors SCP advisory council, as long as the advisory council is established and operated as entity separate from the sponsor; in other words, the advisory council must not be a part of the sponsor.
4.2.2 Role
Subject to the requirements in the applicable AmeriCorps Seniors SCP program regulations regarding the purpose and composition of this group, sponsors have flexibility concerning the specific structure and operation of this body. Depending on local community circumstances, the advisory council may be used by the sponsor to:

- Assist in assessing community needs;
- Assist in fund raising and resource development;
- Support the development of a service ethic in the community;
- Advise on volunteer recruitment, retention, and recognition strategies;
- Suggest candidates for project staff positions;
- Link the project with other community service resources, including faith-based organizations;
- Advise on data collection and performance measurement;
- Assess project accomplishments and impact, including progress toward meeting performance measures;
- Assess satisfaction of volunteers and volunteer stations;
- Suggest ways the project can gain increased visibility and recognition in the community; and/or
- Advise on how trends in the community are affecting seniors.

AmeriCorps Seniors SCP projects should keep thorough records of advisory council participation and structure such as the group’s bylaws, current membership, and meeting minutes. Additional resources on Appendix A.23 Understanding the Roles and Responsibilities of Advisory Councils can be found on the Knowledge Network.

4.2.3 Membership
Remember, an effective advisory council can expand the capacity of the sponsor and project staff. The advisory council must have a membership that includes people [45 CFR 2551.24]:

- Knowledgeable of human and social needs of the community;
- Competent in the field of community service and volunteerism;
- Capable of helping the sponsor meet its administrative and program responsibilities including project assessment, fund-raising, publicity, and data reporting requirements;
- With interest an in and knowledge of the capability of older adults;
- Who are of a diverse composition that reflects the demographics of the service area.

Additional resources on Building an Effective Advisory Council can be found on the Knowledge Network.
4.2.4 Allowability of Costs

As advisory councils are required by AmeriCorps Seniors regulations (45 CFR 2551.24(a), grantees may expend reasonable amounts to support their activities. Such costs should still meet all other aspects of OMB cost principles, including being allowable, allocable, reasonable and necessary, as well as being documented sufficiently.

If you have a question about a specific type of expense, consult your Portfolio Manager to ensure that it meets these conditions.
5 PROJECT STAFF

5.1 GENERAL PROVISIONS
The project director must be an employee of the sponsor subject to the sponsor’s personnel policies and practices. Sponsors may also directly employ project staff to support the project director, as well as consultants and contractors, provided that the sponsor does not delegate or subcontract responsibility for fulfilling project management requirements. [45 CFR 2551.22 and 45 CFR 2551.25]

Hiring of project personnel must be in compliance with the Civil Rights Act of 1964, as amended, the Domestic Volunteer Service Act, the Serve America Act, other Federal civil rights statutes and regulations, applicable state laws and local ordinances, and sponsor personnel and employment practices.

5.2 STRUCTURE
The program regulations require that the sponsor employ a project director and other staff appropriate to accomplish the purposes of the project. See 45 CFR 2551.25 (b) - (e) for provisions regarding staffing levels and compensation for staff. The size of each individual project and budget levels will often dictate the number of project staff needed to effectively manage the project.

In structuring the staffing pattern, the following should be considered:

a) Size of the service area
b) Number, kind, and location of volunteer stations
c) Number of volunteers
d) Geographic distribution of AmeriCorps Seniors volunteer assignments
e) Types of AmeriCorps Seniors volunteers in SCP placements and assignments (more project staff time is sometimes needed to administer and monitor AmeriCorps Seniors volunteers in SCP within home assignments)
f) Specific needs of the clients served
g) Availability of funds
h) Meeting Performance Measure requirements which involves collecting, storing, and aggregating data
i) The potential for programs to continue to improve how they build and use evidence, including understanding local community needs, analyzing and acting on performance measurement data, preparing for possible external evaluations, or implementing evidence-based programming
j) Availability of supplemental state or federally subsidized full- or part-time staff, and AmeriCorps Seniors SCP or non-AmeriCorps Seniors staff
• AmeriCorps Seniors grantees can collaborate with the Senior Community Service Employment Program (SCSEP), authorized by Title V of the Older Americans Act, to jointly engage older adults in several ways, such as:
  
  i. AmeriCorps Seniors and SCSEP grantees can work together to enable their participants to support joint community service projects;
  
  ii. SCSEP participants nearing their 4-year limit on participation may be interested in participating in AmeriCorps Seniors;
  
  iii. AmeriCorps Seniors volunteers, who meet age and income qualifications and seeking paid employment, may be interested in participating in SCSEP.
  
  iv. More information about SCSEP grantees see the Senior Community Service Employment Program website.

• Volunteer staff, consistent with the nature and purpose of AmeriCorps volunteer programs, are persons with management experience and others with experience in office operations, who may be deployed to strengthen and expand the operations of AmeriCorps Seniors SCP projects.

• Non-AmeriCorps Seniors volunteers can be budgeted as in-kind contributions for necessary project operational functions.

• For information on how some AmeriCorps Seniors volunteers may be able to engage in indirect service activities designed to strengthen the project and to support AmeriCorps Seniors volunteers that are engaged in direct service, see Chapter 7.4, on AmeriCorps Seniors Senior Companion Program Leaders.

5.3 PERSONNEL POLICIES FOR PROJECT STAFF

The applicable AmeriCorps Seniors SCP program regulations require that project staff be covered by sponsor personnel policies [45 CFR 2551.25(d)]. At a minimum, policies should address salaries and fringe benefits, probationary periods of service, national service criminal history checks, suspensions, resignations, hours of employment, vacations, sick leave, holidays, terminations, and grievance procedures.

1) The sponsor shall compensate project staff at a level that is comparable with similar positions in the sponsor organization and/or the project service area, as is practicable [45 CFR 2551.25(e)].

2) The sponsor should prepare a job description for each project staff position to promote the recruitment of qualified applicants and to specify each position’s authority and responsibility. It is recommended that an annual performance evaluation be completed for all staff.

3) It is critical that AmeriCorps Seniors sponsors make National Service Criminal History Checks (NSCHC) a priority when hiring project staff. Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. Please read this section and the NSCHC webpage carefully to be sure your policies and your implementation procedures are in compliance.
with the requirement. Grantees should contact their portfolio managers for NSCHC questions or requirement clarification.

5.3.1 NSCHC Overview
Under the National and Community Service Act of 1990, as amended by the Serve America Act of 2009, all AmeriCorps grantees must conduct NSCHC on grant-funded staff and national service participants that receive a salary, national service education award, living allowance, or stipend under AmeriCorps grants. Individuals in these positions must undergo the process in a timely manner, or the noncompliant grantee may be subject to cost disallowance. Certain parts of the process need to occur prior to charging any staff time to an AmeriCorps grant. Therefore, it is critical to comply with the NSCHC requirements on time, every time.

The Code of Federal Regulations outlines the Nationals Service Criminal History Check rules and regulations in full at 45 CFR 2540.200–207. Additional information on NSCHC, including the required annual NSCHC e-course, an FAQ document, and links to technical assistance resources can be found on the NSCHC webpage.

AmeriCorps has published a new NSCHC Regulation 45 CFR 2450.200 - .207 (effective May 1, 2021). Please see the NSCHC Rule Summary document for information on the new rule.

These requirements are statutory minimums, and individual grantees can, and often should, supplement these with additional safeguards for vulnerable populations, such as additional screening mechanisms, additional eligibility criteria, a code of conduct, training for staff and volunteers, and a clear system for reporting and handling reports of any harm or potential harm to vulnerable populations resulting from their program. Contact your portfolio managers for more resources on ways to protect your program’s vulnerable beneficiaries.

5.3.2 NSCHC Enforcement
Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. More information on cost disallowance can be found in the NSCHC Enforcement Guide. Grantees that self-report non-compliance to a monitoring official prior to any written notice of future oversight or monitoring activity (such as IPERA sampling, IG audit or investigation, site visit, desk review, etc.) may receive a reduction in their cost disallowance. As a result, it is in an organization’s interest to develop a system for monitoring its own compliance.

5.3.3 NSCHC Resources
See AmeriCorps Knowledge Network/Criminal History Checks for links to the regulations, requirements, and training materials. Video Training, NSCHC eCourse, FAQs, NSCHC Documentation Checklist is especially helpful to AmeriCorps Seniors grantees.

See May 1 NSCHC Rule Resources for quick summary, Rule Summary, Rule Manual, FAQs, and Rule Interim FAQs.
5.4 PROJECT STAFF ROLES

5.4.1 Project Director

1) The sponsor assigns responsibility for the project’s daily management to the project director. A project director functions as a working project manager, actively involved with community organizations, AmeriCorps Seniors volunteers, and volunteer stations. The sponsor should establish procedures for internal review and approval of project director performance in accordance with its standard policies and procedures. The project director may serve as the representative of the sponsor in signing and approving official project documentation, including project reports, memoranda of understanding, and letters of agreement for in-home assignments.

2) The project director serves full-time, except as negotiated otherwise with AmeriCorps Seniors. A full-time project director may not serve concurrently in another capacity, paid or unpaid, during established working hours. A sponsor may negotiate in writing the employment of a part-time project director with AmeriCorps Seniors when it can be demonstrated that such an arrangement will not adversely affect the size, scope, and quality of project operations. The project director may participate in activities to coordinate program resources with those of related local agencies, boards, or organizations. [45 CFR 2551.25(c)]

3) In the case it becomes necessary to dismiss a project director for cause, sponsors should follow their established personnel policies and procedures. When such action is apparent, (as well as in any other situation where the project director resigns) the sponsor should immediately notify the portfolio manager, stating the reason(s) for the action. When necessary, provisions for temporarily continuing operations without a project director should also be submitted to the portfolio manager in writing.

4) Under direction of the sponsor’s executive director /CEO or designee, the project director’s duties typically include, but are not limited to:

   a) Assessing volunteer needs of the community and planning and developing all phases of the project operation.

   b) Selecting, training, supervising, and evaluating project staff.

   c) Recruiting, orienting, placing, and arranging for assignment of AmeriCorps Seniors volunteers.

   d) Providing coordinated pre-service orientation, in-service instruction, and overall supervision of AmeriCorps Seniors volunteers with volunteer station professional staff.

   e) Incorporating performance measurement principles and practices in program development, volunteer placement, and project assessment.

   f) Maintaining appropriate fiscal and program records and preparing reports.

   g) Developing and maintaining close coordination with volunteer stations.

   h) Enhancing the total project effort through active involvement with community organizations, other national service programs, and other senior and volunteer programs.

See Appendix E.2 for a sample position description for a Project Director.
i) Keeping AmeriCorps Seniors SCP advisory council members informed and soliciting their advice on matters affecting project operation; providing staff assistance to the advisory council.

j) Working in cooperation with sponsor staff, advisory council members, and volunteer station staff to obtain resources for the project.

k) Providing information and support to AmeriCorps Seniors volunteers.

l) Appraising AmeriCorps Seniors volunteer performance.

m) Assessing appropriateness and performance of volunteer stations.

n) Attending training conferences conducted or authorized by AmeriCorps.

o) Preparing and submitting applications and requests for amendments in the electronic grants system.

5.4.2 Project Coordinators
When funds allow, and the project director is in need of professional assistance, additional staff may be hired to help coordinate project activities.

Coordinator responsibilities may include, for example:

1) Coordinating and monitoring project activities including recruitment, in-service training, supervisory arrangements, and other activities in cooperation with the project director and appropriate volunteer station staff.

2) Coordinating AmeriCorps Seniors volunteer in SCP assignments including assisting volunteer station staff to develop volunteer assignment plans and volunteer activities and monitoring progress toward achieving the expected outcomes and impact specified in assignment plans.

3) Enhancing the total project effort through active involvement with community organizations, other national service programs, and other senior and volunteer programs.

4) Providing information and support to AmeriCorps Seniors volunteers.

5) Assessing appropriateness and performance of volunteer stations.

6) Attending training conferences conducted or authorized by AmeriCorps Seniors as funding allows.

5.4.3 VOLUNTEER SUPERVISION

5.4.3.1 Staff Responsibility
1) The project staff’s general responsibility regarding the supervision of AmeriCorps Seniors volunteers is to:
   a) Ensure that volunteer stations designate a staff member to provide day-to-day supervision of AmeriCorps Seniors volunteers while on assignment and that supervision is effective.
   b) Concur with the volunteer station staff’s selection of client for assignment to each AmeriCorps Seniors volunteer.
c) Ensure maintenance of person-to-person relationships between AmeriCorps Seniors volunteers in SCP and clients to whom they are assigned.
d) Provide orientation and regular in-service training to explain policies, enhance skills related to assignments, provide information concerning community services available to low-income older persons, and arrange for group discussion to share experiences and address issues.

2) Specific supervisory practices vary from project to project and derive from project oversight obligations identified in the Memorandum of Understanding and in individual volunteer assignment plans.

Examples are:

a) Clarifying with volunteer stations the arrangements for days and hours of service and the agreed-upon activities defined in the Memorandum of Understanding.
b) Making periodic site visits to volunteer stations and in-home sites to monitor the satisfaction of the AmeriCorps Seniors volunteers their assignments and the progress of clients in reaching established objectives; determining, in coordination with the volunteer station, whether or not the services of the AmeriCorps Seniors volunteers are appropriate to the client's needs or whether the volunteer should be reassigned.

5.5 EFFECTIVE PRACTICES FOR BUILDING PROJECT STAFF

Effective practices for creating and sustaining a strong working relationship among the sponsor’s executive and fiscal staff, the project director, and other project staff include:

A. Sponsor leadership and the project director establish and maintain a productive working relationship based on clear communication and mutual support;

B. The project director has clearly defined responsibilities and written policies and procedures for project operations and support;

C. The sponsor develops and maintains clear lines of reporting between project staff and the sponsor’s executive and fiscal staff;

D. The sponsor develops a written job description for each project staff position and annually reviews job descriptions for any changes in roles or responsibilities;

E. The sponsor provides staff with high quality supervision and support to maximize job performance;

F. The sponsor ensures project staff receive an orientation to the AmeriCorps Seniors, AmeriCorps Seniors Senior Companion Program, and the project prior to their assuming project responsibilities;

G. The sponsor provides project staff with opportunities to enhance their understanding of and skills in meeting the needs of the community;

H. The sponsor encourages project staff to showcase their expertise as national and community service professionals by presenting at conferences, workshops, or community forums;
I. The sponsor includes project staff in professional development opportunities available to all other agency staff;

J. The sponsor ensures that each project staff member sets performance goals for his or her work on an annual basis and is evaluated annually on that basis;

K. The sponsor includes the project director as an integral member of the agency’s staff;

L. The sponsor recognizes the achievements of project staff through specific activities and/or events comparable to other agency staff;

M. The sponsor seeks ethnic, racial, cultural, and skills diversity in volunteer teams and/or working groups that address project planning, operations, and assessment; and

N. The sponsor seeks the participation of individuals from diverse ethnic and racial backgrounds and with a variety of skills in project management and decision-making.
6 VOLUNTEER STATIONS

6.1 INTRODUCTION
AmeriCorps Seniors volunteers are recruited and enrolled by the AmeriCorps Seniors SCP project and placed with or through volunteer stations. Volunteer stations are encouraged to support AmeriCorps Seniors SCP by referring prospective volunteers to the project.

6.1.1 Characteristics of Volunteer Stations
A volunteer station is a public agency, secular or faith-based private non-profit organization, or proprietary health care organization that accepts the responsibility for assignment and supervision of AmeriCorps Seniors SCP volunteers. Each volunteer station must be licensed or otherwise certified, when required, by the appropriate state or local government. Neither informal groups nor private homes qualify as volunteer stations (45 CFR 2551.12).

A. The Memorandum of Understanding with such volunteer stations must include detailed provisions to ensure compliance with program regulations regarding Non-displacement of Employed Workers and Non-impairment of Contracts for Service [45 CFR 1216.1.1 - 1216.1.4].

B. Individual private homes may not be volunteer stations. In-home assignments are made only through a volunteer station (see In-Home Assignments in Chapter 7).

C. Volunteer stations are located within the project's service area as defined in the approved grant application.

D. AmeriCorps Seniors volunteers in SCP should not be assigned to nursing homes or other long-term care facilities as volunteer stations but may continue to serve an existing client during periods of short-term care in these facilities.

E. Proprietary health care organizations are private, for-profit health care organizations that serve one or more vulnerable populations (45 CFR 2551.12). As noted above, licensed proprietary health-care organizations may be volunteer stations. The entity responsible for licensing varies from state to state and may even vary based on the type of health care organization e.g. hospital, nursing home, assisted living facility. If project sponsors are unsure of the licensing body in their state, the U.S. Department of Health and Human Services (HHS) offers the site healthfinder.gov that has a listing of state agencies on health, which for many states, but not all, will be the entity responsible for health-care organization licensing. Additionally, if sponsors are uncertain of their state’s licensing requirements, HHS is a good place to start, as well as the state entity responsible for licensing and regulating health care organizations if known. All such placements must limit volunteer assignments to those which provide direct and traditional assistance to patients, such as visiting, teaching, counseling, entertaining, etc. Placements must not displace paid employees, must not supplant the hiring of paid employees, and must avoid other staff or clerical assignments which would accrue to the profitability of the proprietary health-care organization.

6.1.2 Types of Volunteer Stations
AmeriCorps Seniors volunteers in SCP should be placed with stations where they can provide supportive, individualized services to help older adults with special needs to maintain their dignity and independence.
Potential volunteer stations include but are not limited to the following types of agencies or organizations, if they serve eligible clients as defined in the AmeriCorps Seniors SCP regulations: Examples of Volunteer Stations

<table>
<thead>
<tr>
<th>Home healthcare agencies</th>
<th>Public health departments including clinics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private non-profit or proprietary health agencies including clinics</td>
<td>Public and private non-profit social services agencies</td>
</tr>
<tr>
<td>Public and private non-profit mental health agencies and associations (non-residential)</td>
<td>Rehabilitation associations and centers</td>
</tr>
<tr>
<td>Multi-purpose centers including Senior Centers</td>
<td>Visiting Nurses Associations</td>
</tr>
</tbody>
</table>

6.1.3  AmeriCorps Seniors SCP Project or Sponsor as Volunteer Station

The AmeriCorps Seniors SCP project itself may function as a volunteer station or initiate special volunteer activities provided that AmeriCorps agrees that these activities are in accordance with program objectives outlined in the grant and will not hinder overall project operations.

6.1.4  Volunteer Station Cash or In-Kind Support of Volunteers

1) In accordance with 45 CFR 2551.121(c), an AmeriCorps Seniors SCP volunteer station may contribute to the financial support of the AmeriCorps Seniors SCP project. However, this support shall not be a required precondition for a potential station to obtain AmeriCorps Seniors volunteers. If a volunteer station agrees to provide funds to support additional volunteers or pay for other volunteer support costs, the agreement must be stated in the written Memorandum of Understanding with the station.

2) When establishing such support, the best time for a project director to raise the possibility of financial support is when he or she is meeting with a potential station to establish the terms of the MOU. The discussions with the station representative should be clear that any donation is voluntary, not a fee for service, or a requirement of program participation. In addition:
   - The MOU must document the terms established, using language that confirms the donation is voluntary, not a fee for service, or a condition of program participation.
   - There should be no consideration given to cost per volunteer, number of hours served, or number of beneficiaries being served when determining a donation amount. Rather, the commitment to donate funding to the project should be stated in a way that demonstrates community support for the program.

3) The sponsor must withdraw services if the station's inability to provide monetary or in-kind support to the project under the Memorandum of Understanding diminishes or jeopardizes the project's financial capabilities to fulfill its obligations. Cash or in-kind support from a station should not be confused with fee-for-service. See Appendix A.12 for more information.

6.1.5  Volunteer Station Roster

A current roster of volunteer stations must be included in the electronic grants management system with each grant renewal or continuation application. For all newly awarded grantees, station rosters should be submitted when completing the PPR Light. Projects will enter the names and addresses of their stations, the names and contact information for the volunteer station supervisors, a various other information for
each station. Step-by step instructions for developing and submitting Station Rosters are found on the AmeriCorps Seniors’ SCP grantee webpage.

6.2 VOLUNTEER STATION ROLES AND RESPONSIBILITIES

6.2.1 Responsibilities of AmeriCorps Seniors SCP Volunteer Stations
Individual volunteer assignment plans are required for all AmeriCorps Seniors volunteers in SCP [45 CFR 2551.72]. Assignment plans are developed by the station in collaboration with the AmeriCorps Seniors SCP project staff. The assignment plan must be approved and signed by the project staff on behalf of the sponsor, station representative, and the volunteer. (See Appendix E.1 for a sample Volunteer Assignment Plan.)

1) Development of Volunteer Assignment Plans
   The following steps are recommended to develop volunteer assignment plans:
   a) Identify prospective clients to be served;
   b) Document the specific need(s) of the clients;
   c) Describe the activities the AmeriCorps Seniors volunteer will perform, the schedule for their performance, and the supervisory relationship between the volunteer and the volunteer station;
   d) Describe the expected results of the AmeriCorps Seniors volunteer’s activities;
   e) Describe the expected impact on the client of attaining the expected results; and
   f) Format the assignment plan, to show, by their respective signatures, the acceptance of the plan by the AmeriCorps Seniors volunteer and approval by project and station staff.

2) Management of Assignment Plans
   a) Volunteer assignment plans should be reviewed periodically to ensure that they remain current and appropriate for the AmeriCorps Seniors volunteers in SCP and their clients.
   b) Annually, a review of each AmeriCorps Seniors volunteer’s impact should be performed, which examines:
      c) The client’s needs;
      d) The service activities performed, adjustments made, and potential areas for improvement;
      e) Adherence to planned schedule and adjustments made;
      f) Results or accomplishments achieved; and
      g) Impact on the client.
6.2.2 Letters of Agreement for In-Home Assignments
Under 45 CFR 2551.62(d) volunteer stations that manage assignments in private homes must obtain a Letter of Agreement describing and authorizing the AmeriCorps Seniors volunteer activities in each home. See Chapter 7: AmeriCorps Seniors SCP Volunteer Assignments for more information on Letters of Agreement for In-Home Assignments.

6.2.3 Volunteer Station Participation in Training Events
1) During the initial orientation of volunteers, project staff are encouraged to involve volunteer station staff in the program overview and explanation of services and volunteer activities. This may be accomplished through group presentations in formal classroom exercises and station site visits.
2) Project staff are also encouraged to utilize volunteer station staff and other community resource professionals to cooperatively plan and implement monthly in-service training events.
3) AmeriCorps Seniors volunteer assignments at some volunteer stations may necessitate training over and above the 24 hours of pre-service orientation and at least 24 hours annually of in-service training (45 CFR 2551.23(f)).

6.2.4 Volunteer Station Supervision of AmeriCorps Seniors Volunteers
Volunteer stations are responsible for the daily supervision of AmeriCorps Seniors volunteers on assignment. The quality of supervision or support is the most critical factor, after the assignment itself, in contributing to the success of the AmeriCorps Seniors volunteer experience. Supervision should be on-going and constructive. The volunteer station supervisor may be a different staff member than the station representative who signs the MOU. Supervision includes:

1) Development of individual volunteer assignment plans in collaboration with project staff.
2) Providing regular and on-site supervision of AmeriCorps Seniors volunteer performance on assignments.
3) Monitoring of volunteer activities regularly to ensure that AmeriCorps Seniors volunteers and clients are satisfied with the assignment and, with project staff, determine the continued appropriateness of the assignment.
4) Annually completing written volunteer performance appraisals
5) Referring AmeriCorps Seniors volunteers to project staff for possible reassignment, transfer, or termination.
6) Carrying out other responsibilities identified in Memorandum of Understanding, Letters of Agreement, and individual plans.

6.2.5 Volunteer Station Responsibilities Concerning Transportation
1) Volunteer stations are responsible for arranging AmeriCorps Seniors volunteer travel between different assignments with the same station and for associated costs, unless otherwise provided in the Memorandum of Understanding.
2) Volunteer stations pay all transportation and associated costs for any AmeriCorps Seniors volunteer activities with client such as doctor visits or shopping trips, unless otherwise provided in the Memorandum of Understanding.

6.2.6 Other Volunteer Station Responsibilities
1) Assisting in the provision of appropriate volunteer recognition activities.
2) Providing for volunteer safety.
3) Keeping records and preparing reports required by the sponsor, including:
   a) Volunteer timesheets.
   b) Updates and accomplishments relating to the written volunteer assignment plans.
   c) Data and information to document and report accomplishments and impacts for the client and other data needed for AmeriCorps Seniors SCP Progress Reports.
   d) Volunteer performance reports.
   e) Testimonials and examples of how AmeriCorps Seniors volunteers meet the needs and improve the lives of clients served as well as of impact on the capabilities of the volunteer station and its staff to carry out the station’s mission and/or achieve its goals, objectives, responsibilities to clients, etc.

6.3 PREPARATION OF THE MEMORANDUM OF UNDERSTANDING

6.3.1 Purpose
The Memorandum of Understanding (MOU), which must be negotiated prior to placing volunteers, describes program requirements, working relationships, and mutual responsibilities between the sponsor and the volunteer station. The MOU includes general conditions applicable to all projects and volunteer stations and special conditions applicable to the local volunteer station. The basic requirements for the MOU are found in the regulations at 45 CFR 2551.23(c) (2). (See Appendix C.1 for a sample Memorandum of Understanding.)

6.3.2 Renegotiating and Updating
The Memorandum of Understanding must be reviewed and renegotiated at least every three years. The effective date of a new MOU must be on or after the date the MOU is signed. The MOU may be amended at any time by mutual agreement. Projects are encouraged to require volunteer stations to notify them as soon as any circumstances arise which could affect or require changing the provisions of the MOU, such as the volunteer station’s ability to meet commitments for providing specified contributions toward project costs, changes in the sites where volunteers serve, or other conditions which have a bearing on volunteer assignments.

6.3.3 Content
Each volunteer station must have a MOU in effect, which ensures the placement of AmeriCorps Seniors volunteers. The MOU is a formal arrangement between the sponsoring organization and the volunteer station and in many cases, it serves as the primary source of documentation establishing the relationship between entities.

As set forth in 45 CFR 2551.23(c) (2), the MOU must:
1) Be negotiated prior to placement;
2) Specify the mutual responsibilities of the station and sponsor;
3) Be renegotiated at least every three years; and
4) State that the volunteer station assures it will not discriminate against AmeriCorps Seniors volunteers or in the operation of its program on the basis of race, color, national origin, gender,
age, religion, sexual orientation, disability, gender identity or expression, political affiliation, marital or parental status, or military service.

The MOU should be customized to meet the needs of the project and the volunteer stations. See Appendix C.1 for a sample MOU form.

**In addition to the above requirements we highly recommend that you include:**

1) The name, street and e-mail addresses, and telephone and fax numbers of the volunteer station.

2) The name of the primary volunteer station staff member responsible for day-to-day supervision of AmeriCorps Seniors volunteers in SCP and a description of supervisory arrangements.

3) Volunteer station and sponsor contributions to support AmeriCorps Seniors volunteers (meals, insurance, transportation, physical examinations (if applicable), uniforms, and recognition) and/or other project costs.

4) A data sharing agreement that includes a description of the data needed from the volunteer station to complete the project’s performance measures, a schedule for delivery, and a description of who will collect the data. See Appendix A.13 for a sample data sharing agreement.

5) An assurance that the volunteer station is a public or non-profit organization or a proprietary health care agency.

6) A description of prohibited activities and special limitations (outlined in Chapter 2).

7) An agreement that the volunteer station shall provide specific written individual volunteer assignment plans for each volunteer prior to assignment.

8) An agreement that the volunteer station shall verify that AmeriCorps Seniors volunteers serve only eligible clients.

9) Provision for a Letter of Agreement for in-home assignments. (See Appendix C.10 for more information.)

10) Provision for ensuring that the National Service Criminal History Check meets all AmeriCorps Seniors requirements prior to AmeriCorps Seniors volunteers beginning their service.

11) Provision for the safety of the AmeriCorps Seniors volunteers while on assignment.

12) An assurance that the volunteer station provides reasonable accommodation(s) for persons with disabilities (including those with mobility, hearing, vision, mental and cognitive impairments or addictions and diseases) to participate in programs and activities.

13) An agreement that the volunteer station shall provide required reports.

**You may also want to include:**

1) An estimate of the number of AmeriCorps Seniors volunteer assignments projected to be available with or through the volunteer station.

2) A brief description of the AmeriCorps Seniors volunteer assignment(s).

3) A listing of geographic locations/sites, other than private homes, where volunteers will serve through the volunteer station and the number of volunteers placed at each site.

4) An estimate of the number of clients to be assisted by AmeriCorps Seniors volunteers.

5) The average number of persons the volunteer station serves annually.
6.3.4 MANAGEMENT OF VOLUNTEER STATIONS
1) AmeriCorps Seniors volunteers may be placed with more than one volunteer station, depending on the need for service and individual AmeriCorps Seniors volunteers' capabilities.

2) The sponsor should appraise all volunteer stations regularly to determine continued viability. Assessments should include types of clients served, supervision and training provided AmeriCorps Seniors volunteers, compliance with program regulations, data collection requirements, and other support.

6.4 EFFECTIVE PRACTICES FOR MANAGING VOLUNTEER STATIONS

I. Effective Practices for Developing Volunteer Stations

The sponsor develops a system of volunteer stations that:

A. Addresses significant needs of the community as validated by community-accepted studies and reports prepared by government, community groups, or educational institutions;
B. Provides a sufficient number of stations that are accessible to individuals with disabilities;
C. Is manageable in terms of size and complexity to ensure that ongoing interaction, communication, and monitoring of stations are realistic.
D. Incorporates the abilities, experience, and needs of senior volunteers in their programs and operations.

II. Effective Practices for Communication between the Project and Volunteer Stations

The sponsor establishes clear and effective systems of communication between the project and volunteer stations by:

A. Conducting an orientation for station staff about the AmeriCorps Seniors, AmeriCorps Seniors SCP, and the project prior to the placement of volunteers.
B. Communicating to the volunteer stations its policies on the terms and conditions of AmeriCorps Seniors SCP volunteer service; volunteer service termination; and procedures for volunteers to appeal adverse decisions related to volunteer stations.
C. Providing volunteer stations with ongoing information and/or training about the project, its performance measurement goals, and the role of the volunteer station in meeting those goals.
D. Developing a checklist, guidance, and/or criteria that identifies factors in selecting volunteer stations.
E. Developing criteria for the optimal number of volunteers serving at each station.

III. Effective Practices for Working with Volunteer Stations to Achieve Performance Measures

A. The sponsor and project staff make informed decisions about the community needs to be addressed and the volunteer stations that provide placement opportunities for AmeriCorps Seniors volunteers. The project:
   1. Identifies the needs and priorities that the project will address and the agencies that serve them;
   2. Uses data to document the nature and scope of the needs and why they have been selected, and works with volunteer stations on data collection methods;
3. Consults staff, AmeriCorps Seniors volunteers, the volunteer stations, and the Advisory Council in determining priority community needs on which the project will focus;
4. Works with each volunteer station to determine the service to which AmeriCorps Seniors volunteers are assigned; and
5. Identifies and communicates its anticipated accomplishments and goals to the volunteer station supervisors.

B. The project works with volunteer stations to collect data that measures progress in achieving the anticipated performance measurement targets. The project and volunteer stations:
   1. Work together to determine the types of data needed to measure progress in achieving its output and outcome targets;
   2. Determine, prior to initiating service efforts, the data collection instrument descriptions it will use as the standards for measuring and reporting progress;
   3. Collaborate to develop and implement an information system that utilizes existing data whenever possible, produces the information needed to demonstrate outputs and outcomes; and allows information to be easily retrieved;
   4. Consistently and accurately provide the needed data;
   5. Use the assessment to adjust service assignments and the project’s portfolio of volunteer stations;
   6. Work together to use the information related to accomplishments to identify the strengths and weaknesses of the project’s programming and to develop specific steps to strengthen volunteer services provided in the community; and
   7. Work together to modify volunteer assignments to more effectively meet the identified needs.
7 AMERICORPS SENIORS’ SCP VOLUNTEER ASSIGNMENTS

7.1 CRITERIA FOR VOLUNTEER ASSIGNMENTS

7.1.1 General Criteria
AmeriCorps Seniors SCP projects will develop volunteer assignments in alignment with AmeriCorps Seniors SCP performance measure work plans and outcomes and will do so prior to the recruitment of AmeriCorps Seniors volunteers. Volunteer assignments should incorporate how the assignment will support performance goals and the service described in the proposed work plans. Assignments serve the dual purpose of providing a high-quality experience for volunteers and meeting the individualized needs of older clients who have one or more limitations that place them at risk of maintaining their independence.

7.1.2 AmeriCorps Seniors Volunteer Assignments
Project staff, on behalf of the sponsor, the AmeriCorps Seniors volunteer, the client (where possible), and/or family caregiver (as appropriate) must concur with each assignment. All assignments must meet the following criteria:

1) Assignments and activities must involve person-to-person supportive relationships with the population served. AmeriCorps Seniors volunteers serve only adults, primarily older adults, who have one or more physical, emotional, or mental health limitations and are in need of assistance to achieve and maintain their highest level of independent living.
2) Assignments should include activities that lead to measurable outcome-based results as noted in the Grant Application Guidelines.
3) Assignments may not include administrative support service to the volunteer station.
4) An AmeriCorps Seniors volunteer must serve a minimum of 260 hours annually, or a minimum of 5 hours per week, not to exceed a total of 2,080 hours per year (45 CFR 2551.51).
5) Assignments and activities should serve the dual purpose of providing a high-quality experience that will enrich the lives of the volunteers and meet critical community needs that are aligned with national performance measures and provide specific outcomes for the clients served.
6) Volunteer stations provide a written outline of duties or description of individual assignments [45 CFR 2551.12(y) and 2551.62]. These should be maintained on file in the AmeriCorps Seniors SCP office or at the volunteer station and a copy should be given to each volunteer when assigned. Written assignments help to identify and clarify what the volunteer is expected to do and help to avoid misunderstanding. (See Appendix E.2 for a sample AmeriCorps Seniors SCP volunteer assignment description.)
### 7.2 Selection of Assignments

1) Assignments and terms of service, including the service schedule, should reflect individual AmeriCorps Seniors volunteer preferences and skill set along with the needs of clients. Project and volunteer station staff should ensure that a range of service opportunities are available to provide a choice of assignments for AmeriCorps Seniors volunteers.

2) Because AmeriCorps Seniors volunteers are a limited resource, assignments should give priority to older adults who have the greatest potential to achieve and maintain independent living. Individuals who live in a private residence (house, apartment, mobile home, etc.) rather than in an assisted living facility, nursing home, or group home are defined as living independently.

3) To the greatest extent possible, preference should be given to assignments where the activities provided by the AmeriCorps Seniors volunteer actively involves the participation of the client. In the case of respite assignments, the recipients of service, in this context, are those being provided direct services, not the caregiver.

### 7.2.1 In-Home Assignments

#### 7.2.1.1 Careful Planning with Volunteer Stations

In home assignments of AmeriCorps Seniors volunteers require planning by the sponsor and by volunteer station professional staff in cooperation with clients and their guardians when appropriate.

#### 7.2.1.2 Letters of Agreement for In-Home Assignments

1) According to 45 CFR 2551.62(c) volunteer stations managing assignments in private homes must develop a Letter of Agreement describing and authorizing the volunteer activities in each home.
The requirement for Letters of Agreement must be incorporated in the Memorandum of Understanding.

2) Letters of Agreement contain a statement authorizing a volunteer assignment in a person's home and designating the activities to be performed. The Agreement also defines arrangements for days and hours of service and the specific plan for the volunteer's supervision. The person to be served (or their legal guardian), the volunteer station, and the sponsor sign the letter of agreement.

3) The Letter of Agreement provides a common understanding of what the volunteer will and will not do while on an in-home assignment. Such an agreement is not required for casual or friendly visiting that is not part of a regular, ongoing program of activities organized by a volunteer station. For example, the delivery of meals to a home would normally not require a Letter of Agreement.

4) In some cases, projects may work with organizations, such as hospices, which have obtained Letters of Agreement, or equivalent written agreements with their individual clients. In these cases, organizations may sign general letters of agreement covering all of the organization’s home-based clients and that identify clients to be served and that specify volunteer activities, rather than obtaining individual letters for each client. The Memorandum of Understanding with the volunteer station must reference any such agreements.

5) Letters of Agreement for In-Home Assignments may be included in a volunteer’s assignment plan if the assignment plan includes all the information above and all required signature. A template assignment plan is included in Appendix E.1 and a template letter of agreement for in-home assignment is included in Appendix C.10. A sponsor may combine these templates to address this situation, if appropriate.

7.2.2 Teleservice
AmeriCorps Seniors projects have service opportunities that lend themselves to teleservice, it is important that any project choosing to include an element of teleservice has a policy in place to guide volunteers and stations. Teleservice is appropriate only when the activity can be meaningfully supervised, and the hours verified independently. If a sponsor determines that teleservice is appropriate in unique situations, it must establish a policy that addresses the following:

- written authorization of teleservice from your portfolio manager in advance
- expectations of the communication requirements between supervisors and teleserving volunteers
- mitigation of the increased risk of time and attendance abuse
- appropriate supervision including validation of the activities to be performed, and
- verification of hours claimed.

Sponsors should be aware that their staff may be subject to legal sanctions for erroneously certifying that AmeriCorps Seniors volunteers have valid service hours for time claimed in teleservice. In addition, there are legal and financial penalties for knowingly submitting false claims to the government.

Please see Appendix A.17. COVID-19 Resource Tool Kit and A.18. Technology Support Training for additional support on implementation for teleservice activities.
7.2.3 Service to Family Members

Though rare, AmeriCorps Seniors volunteer Projects may consider placing an AmeriCorps Seniors volunteer in service with a family member as a client. Placements between individuals with familial relationships are not categorically prohibited and this extremely sensitive issue deserves careful consideration before moving forward.

First, the volunteer station must have identified the client as a person in need of assistance. Second, the project is responsible for ensuring that volunteer stations treat clients equally in the selection process. Third, each volunteer must have a service schedule outlining days and times served each week and an assignment description that clearly outlines anticipated service activities and expected outcomes for the client. Maintaining clearly defined service schedules and assignment descriptions will help you establish parameters for the volunteers’ time spent in service as an AmeriCorps Seniors volunteer.

Finally, you should consider establishing policies that set expectations for both parties who are related in order to maintain the highest degree of confidence that placements such as these meet program rules and regulations. Further, projects should consider all alternative options, diligently document why such an assignment is appropriate, and consider the possible public perception before moving forward.

It is strongly recommended you discuss such an assignment with your Portfolio Manager before moving forward.

7.3 Assignment Objectives

All required outcome-based assignments should be selected that fit within AmeriCorps Seniors volunteer primary outcome measures in the Healthy Futures focus area. National Service Performance Measurement requirements can be found on the AmeriCorps Seniors SCP webpage.

Available outcomes for AmeriCorps Seniors volunteers are:

a. H.9A Number of individuals who report having increased social ties or improved capacity for independent living. Service activities in this area may include transportation, companionship, financial literacy, or preventing elder abuse.

b. H.14 Number of caregivers of older adults and individuals with disabilities who reported having increased social support. Service activities in this area may include providing transportation, companionship, or preventing elder abuse.

7.4 AmeriCorps Seniors SCP Leaders

Sponsors may select current AmeriCorps Seniors volunteers, who meet criteria such as exemplary service to their clients, special skills, and leadership abilities, as AmeriCorps Seniors SCP leaders for their projects. In addition to their regular assignment, leaders may spend time assisting newer AmeriCorps Seniors volunteers in performing their assignments and in coordinating activities of these volunteers (45 CFR 2551.73). Like AmeriCorps Seniors volunteers, AmeriCorps Seniors SCP leaders must have an assignment plan that details the specific activities and outcomes the leaders will accomplish. Unlike traditional AmeriCorps Seniors volunteers, AmeriCorps Seniors SCP leaders may engage in indirect service activities designed to strengthen the project and to support the direct service of the AmeriCorps Seniors volunteers.
7.4.1 Assignment Plans for AmeriCorps Seniors SCP Leaders

AmeriCorps Seniors volunteers serving as volunteer leaders receive an assignment plan developed by the volunteer station (45 CFR 2551.73(a)). The leader’s assignment plan:

- is approved by the sponsor and accepted by the AmeriCorps Seniors volunteer;
- identifies the leader’s role and activities and expected outcomes;
- addresses the time period of service; and
- is used to review the status of the AmeriCorps Seniors volunteer’s services identified in the assignment plan, as well as the impact of those services.

7.4.2 Examples of AmeriCorps Seniors SCP Leader Activities

AmeriCorps Seniors SCP leaders will engage in activities that build the capacity of the project in areas such as volunteer recruitment and training in addition to their regular volunteer service with their clients. For example, an AmeriCorps Seniors volunteer that also serves as a leader may serve two clients one-on-one regularly, but also be responsible for planning portions of and facilitating sessions of pre-service orientation for new volunteers as they join the program. Or, an AmeriCorps Seniors SCP leader may serve three clients as part of their regular volunteer activities and, as part of their leader activities, concurrently recruit new volunteers by regularly going to senior centers and senior housing developments in the community to talk about how to become a volunteer.

Leaders may participate in the following activities:

- Assist with recruitment of AmeriCorps Seniors volunteers that engage in direct service
- Mentor and coach new volunteers
- Facilitate volunteer training
- Support overall project planning
- Assist in maintaining relationships with volunteer stations
- Conduct outreach in the community

Leaders may not be assigned any activity that would otherwise be performed by staff or result in the displacement of employed workers (42 U.S.C. 4950 et seq. Sec. 404(a)).

7.4.3 Stipend

A AmeriCorps Seniors SCP leader may be paid a stipend at the same rate as the established AmeriCorps Seniors volunteer stipend for his or her additional hours served as a volunteer leader (45 CFR 2551.73(b)). Additionally, AmeriCorps Seniors SCP leaders, through recognition, may receive an additional monetary incentive (45 CFR 2551.73(c)). The additional monetary incentive should be added to the budget in the “Other Volunteer Costs” section rather than “Stipends” section. Sponsors can find more information on budgeting in Chapter 10 and contact your portfolio managers for instructions and more information if needed.

7.4.4 Monetary Incentive

AmeriCorps Seniors SCP Leaders who are income eligible may receive a monetary incentive, through recognition, in addition to the stipend they receive for their regular and ongoing service as an AmeriCorps Seniors volunteer (45 CFR 2551.73(b)(c)). This incentive should be added to the budget in the “Other Volunteer Costs” section rather than “Stipends” section. See Chapter 10 and contact your portfolio managers for instructions and more information on current policies.
7.5 TERMINATION OF ASSIGNMENTS

1) When possible, plans should be made to phase out the AmeriCorps Seniors volunteer to client relationship gradually to avoid a sudden disruption. Under the following conditions, discontinuance of a relationship should be arranged with the guidance of volunteer station professional staff when a:
   a) The client’s need for individual attention through a person-to-person relationship diminishes, and/or an informal support structure of family and friends has been created and the client is no longer socially isolated.
   b) The relationship is no longer satisfying for the AmeriCorps Seniors volunteer.
   c) The client becomes unmanageable due to acute functional difficulties.
   d) The client’s condition improves to the point where AmeriCorps Seniors volunteer services are no longer needed.
   e) Conflict between the AmeriCorps Seniors volunteer and the client or the client’s family is apparent.

2) Regardless of the cause of termination of an assignment, the decision must be made jointly by project and volunteer station staff, with input of the AmeriCorps Seniors volunteer, if appropriate.

3) Sponsors are asked to keep the portfolio managers fully informed in cases of terminations, voluntary or otherwise, that have potential legal implications for AmeriCorps Seniors SCP staff or the project.

7.6 EFFECTIVE PRACTICES IN AMERICORPS SENIORS VOLUNTEER ASSIGNMENTS

I. Effective Practices for Drawing on the Unique Qualities of Volunteers to Meet the Needs of the Community and those Served

The project:

A. Ensures variety among volunteer stations such that volunteer assignments appeal to a diverse group of volunteers and accommodate varying volunteer skills and interests;

B. Works with volunteer stations to involve volunteers in developing volunteer assignments;

C. Routinely notifies volunteers of new volunteer assignments that are developed or become available; and

D. Ensures that volunteer stations provide volunteer assignments that challenge volunteers to be advocates on behalf of the clients they serve and/or their community.

E. For outcome-based assignments, ensures that the assignment supports the projects performance measure outcomes.

II. Effective Practices for Ensuring the Safety of AmeriCorps Seniors Volunteers

The project:

A. Addresses all relevant safety issues, including service conditions at volunteer stations, prior to permitting AmeriCorps Seniors volunteers to begin their assignments;
B. Addresses reasonable accommodation to volunteers who are qualified individuals with disabilities according to Section 504 of the Rehabilitation Act;

C. Works closely with volunteer stations to ensure that AmeriCorps Seniors volunteers are provided with pre-service and ongoing training on safety issues;

D. Works jointly with volunteer stations to assess, on a regular basis, safety issues related to AmeriCorps Seniors SCP service; and

E. Promptly and effectively responds to AmeriCorps Seniors volunteers’ emergencies and complaints and designates a staff person to respond to such concerns.

III. Effective Practices for Communicating with AmeriCorps Seniors Volunteers

The project clearly communicates with AmeriCorps Seniors volunteers about their roles and responsibilities by:

A. Developing a written volunteer assignment description that specifies the needs of the community and the role and activities of the AmeriCorps Seniors volunteers in delivering the needed services (See Appendix E.1 for an example of an AmeriCorps Seniors SCP assignment description form.)

B. Providing volunteers with a handbook that includes project policies and procedures, the conditions and terms of volunteer service, holidays, service schedules, and cost reimbursements;

C. Ensuring that AmeriCorps Seniors volunteers know their key contacts and sources of assistance or help during their service, and how to contact them.

D. Routinely addressing roles and responsibilities of AmeriCorps Seniors volunteers during in-service training.

The project encourages volunteer stations to set up a process for appraising and documenting volunteer performance that provides feedback and guidance to each volunteer in key areas such as: reliability, actual progress and outcomes, initiative, and leadership.
8 VOLUNTEERS IN AMERICORPS SENIORS SCP

8.1 ELIGIBILITY TO BE ENROLLED

8.1.1 Requirements
AmeriCorps Seniors volunteers must be 55 years of age or older and be capable of serving the frail elderly or adults who have one or more physical, emotional, or mental health limitations and are in need of assistance to achieve and maintain their highest level of independent living. AmeriCorps Seniors volunteers must be able to provide such service without detriment to either themselves or the clients served and be willing to abide by the AmeriCorps Seniors SCP program requirements. [Section 211(a) of the Domestic Volunteer Service Act of 1973, as amended; 45 CFR 2551.41(a)]

8.1.2 Non-Discrimination
Eligibility to be an volunteer in AmeriCorps Seniors SCP may not be restricted on the basis of race, color, national origin, gender, age, religion, sexual orientation, disability, gender identity or expression, political affiliation, marital or parental status, or military service[45 CFR 2551.41(b)].

8.1.3 Income Eligibility Requirement
To be enrolled and receive a stipend, a AmeriCorps Seniors volunteer cannot have an annual income, from all sources, deducting allowable medical expenses, that exceeds the income eligibility guideline for the state in which he or she resides [45 CFR 2551.43]. Current income eligibility levels – including high costs areas – are posted on the AmeriCorps Seniors SCP grantees website; or are available by contacting the appropriate portfolio manager.

8.1.4 Non-Stipended AmeriCorps Seniors volunteers
Persons aged 55 or older with incomes that exceed eligibility guidelines may be enrolled in AmeriCorps Seniors SCP projects as non-stipended volunteers (45 CFR 2551.101). Non-stipended volunteers may serve alongside stipended volunteers and all AmeriCorps Seniors volunteers must be treated consistently and equitably. In other words, non-stipended AmeriCorps Seniors volunteers should be able to serve in AmeriCorps Seniors SCP projects without barriers. Further, AmeriCorps encourages AmeriCorps Seniors SCP projects to engage non-stipended volunteers in service when opportunities are available and when the regulatory conditions detailed below are met.

The following conditions apply to the service of non-stipended AmeriCorps Seniors volunteers (45 CFR 2551.102):

- Non-stipended AmeriCorps Seniors volunteers must not displace or prevent eligible low-income individuals from becoming AmeriCorps Seniors volunteers.
- No special privilege or status is granted or created among AmeriCorps Seniors volunteers, whether stipended or non-stipended, and equal treatment is required.
- Training, supervision, and other support services and cost reimbursements, other than the stipend, are made available equally to all AmeriCorps Seniors volunteers.
- All regulations and requirements applicable to the program apply to all AmeriCorps Seniors volunteers.
• Non-stipended AmeriCorps Seniors volunteers may contribute the costs they incur in connection with their participation in the program. However, an AmeriCorps Seniors SCP project may not count such contributions as part of the required non-AmeriCorps support (match) for the grant.
  o If non-stipended AmeriCorps Seniors volunteers choose not to accept cost reimbursements from the sponsor e.g. transportation and/or meal reimbursements, they may do so. This forfeiture of cost reimbursements may indirectly contribute to costs to the program. However, it is important to note that any forfeited volunteer cost reimbursements cannot directly be used as required program match.

• For information on cost reimbursements for non-stipended volunteers, see Chapter 9.

Sponsors are not required to enroll non-stipended AmeriCorps Seniors volunteers in their program. Further, engaging non-stipended AmeriCorps Seniors volunteers is not a condition for a sponsor to receive a new or continuation grant (45 CFR 2551.103). Additionally, National Service Criminal History Checks (NSCHC) are not required for non-stipended AmeriCorps Seniors volunteers (45 CFR 2540.201). However, projects may opt to conduct checks on non-stipended volunteers for consistency and safety. For more information on the AmeriCorps NSCHC requirements, you may go to https://www.americorps.gov/grantees-sponsors/history-check or contact your AmeriCorps portfolio managers.

8.1.4.1 Role of Non-Stipended AmeriCorps Seniors volunteers

Non-stipended volunteers serving in the AmeriCorps Seniors Senior Companion Program must serve in the same roles as stipended volunteers. Non-stipended AmeriCorps Seniors volunteers’ assignments must provide support for adults, primarily older adults, who have one or more physical, emotional, or mental health limitations, that contribute to them maintaining the highest level of independent living. They assignments and activities must involve person-to-person supportive relationships with the adults served. Each non-stipended AmeriCorps Seniors volunteers must be assigned to individual adults and should include activities that lead to measurable outcomes.

8.2 RECRUITMENT OF AMERICORPS SENIORS VOLUNTEERS

8.2.1 Preparation

1) Before AmeriCorps Seniors volunteers are placed at a station, the sponsor must have a signed Memorandum of Understanding with the volunteer station and have developed, in conjunction with the volunteer station, written assignment descriptions for each AmeriCorps Seniors volunteer. (See Appendix E.1 for a sample Senior Companion assignment description.)

2) Recruitment and enrollment of eligible AmeriCorps Seniors volunteers are project responsibilities and should not be delegated to volunteer stations. However, recruitment assistance for new AmeriCorps Seniors volunteers to the sponsor, in the form of referrals, may come from the AmeriCorps Seniors SCP advisory council, volunteer stations, and other AmeriCorps Seniors volunteers.

3) The sponsor should develop a volunteer recruitment plan that takes into account the following, among other considerations:
a. Location of “active adult” or retirement communities, senior citizen housing, senior centers, clubs, and other settings where people age 55 and older gather or receive services.

b. Local employers of age eligible, or soon to be eligible, employers in both the private and public sectors, as well as independent businesses and trades people.

c. Distance (in both miles and time) between the potential AmeriCorps Seniors volunteer and places of assignment.

d. Modes and estimated costs of available public or private transportation.

4) Special efforts should be made to recruit and assign members of minority groups, persons with disabilities, and hard-to-reach individuals and groups in the service area which are under-represented in the project. Traditionally more women than men have been involved as AmeriCorps Seniors volunteers in the AmeriCorps Seniors SCP program. Projects are encouraged to be creative in finding ways to attract men to become AmeriCorps Seniors volunteers.

5) AmeriCorps Seniors SCP stresses recruitment and enrollment of eligible persons not already volunteering.

6) Recruitment or selection of an AmeriCorps Seniors volunteers may not be based on any requirement of employment experience or formal education. [45 CFR 2551.41]

8.2.2 Choosing Recruitment Methods
Although direct, face-to-face communication with prospective volunteers is most productive, a variety of recruitment methods may be used to reach either broad audiences or specific populations. The most feasible method may depend on:

1) Availability of recruitment resources (the project’s website, social media, newspapers, access to radio and television public service time, available staff, outreach volunteers, etc.).

2) Community acceptance of volunteer programs and federally funded programs.

3) The degree to which communication links exist with seniors, including older members of minority groups, persons with disabilities, and hard-to-reach community members.

8.2.3 Examples of Methods
Recruitment can be done through:

1) Contacting potential recruits individually.

2) Presently enrolled AmeriCorps Seniors volunteers.

3) Contacting agencies and organizations frequented by older persons, such as senior centers, senior nutrition projects, and retiree organizations such as retired teachers’ associations, and retired federal employees’ associations.

4) Contacting religious and civic groups and other community agencies.
5) Contacting other AmeriCorps Seniors volunteer programs in your area: https://americorps.gov/about/our-impact;

6) Recruiting persons on waiting lists for the Senior Community Service Employment Program (Title V of the Older Americans Act);

7) Making presentations or providing materials for distribution at the types of agencies or organizations mentioned above.

8) Advertising through websites, web-based volunteer recruitment systems including AllforGood.org (see below), the sponsoring agency’s newsletter, newspaper articles, public service radio or television interviews, or "spot" public announcements, and the use of social media.

9) Contacting older persons individually

8.2.4 Targeting Recruitment
Targeting recruitment where there is the best possibility of obtaining the most publicity and results, may result in organizations or locations being included where older persons are presently serving as volunteers. Projects should, however, avoid recruiting volunteers away from organizations where they are already volunteering and thus negatively impacting the project’s reputation in the community.

8.2.5 Web-Based Recruitment

8.2.5.1 Project Websites
Increasing numbers of AmeriCorps Seniors SCP projects have developed appealing websites designed to provide basic information about volunteer opportunities and how to express interest in volunteering.

8.2.5.2 AllforGood.org
All for Good is a free online volunteer recruitment system where projects can register their organizations and post their volunteer opportunities and connect with volunteers to learn about them.

8.2.5.3 Social Networks
A Social Network describes any virtual media that enables users to create public profiles within it and form relationships with other users of that same space who access their profile. Social networking sites can be used to describe community-based websites, online discussion forms, chatrooms and other social spaces online and primarily contain user-generated content. Examples of social networks are Facebook, Twitter and YouTube channels, and others described below:

a) Key Terms
   - Blog
     - A website, usually maintained by an individual, with regular entries of commentary, descriptions of events, or other material such as graphics or video, used to communicate information and receive feedback.
   - Online Collaborative and Discussion Groups
     - A discussion group format to connect with people, access information, and communicate effectively over email and on the web.
     - You control the members of the discussion group.
     - No hardware or software to buy, install or maintain.
- Access from anywhere, even from mobile devices.

- **Online Volunteer Recruitment Sites**
  - Online network that connects volunteers with nonprofit organizations.
  - Resource for volunteers to search for volunteer opportunities in their neighborhood, community, city and nationally.
  - When volunteers see your listing, they simply click on it to directly connect with your organization and get involved.

b) **AmeriCorps Social Media Hub** includes:
   - **YouTube**
     - YouTube is a video sharing website
     - A channel on YouTube is the home page for an account. It shows the account, the account type, the public videos they've uploaded, and any user information they have entered.
     - YouTube channels often display favorite videos from other users, activity streams comments, subscribers, and other social network features.
     - You can control the information that appears on your channel.
   - **Twitter**
     - Twitter is an online social networking service that enables users to send and read short 140-character messages called “tweets.”
     - A service for friends, family, and coworkers to communicate and stay connected through the exchange of quick, frequent messages.
     - Tweets may contain photos, videos, and links to other social network sites.
     - AmeriCorps Seniors Twitter handle: @AmeriCorpsSr
     - AmeriCorps Twitter handle: @AmeriCorps
   - **Facebook**
     - Facebook is an online social network website where users can post comments, share photographs and post links to news or other interesting content on the web.
     - A service for friends, family, and coworkers to communicate and stay connected through the exchange of quick, frequent messages.
     - AmeriCorps Seniors Facebook Page: AmeriCorps Seniors / @AmeriCorpsSr
     - AmeriCorps Facebook Page: AmeriCorps / @AmeriCorps

**AmeriCorps Seniors Pathfinder**

This national tool along with your local recruitment efforts, will help you find great AmeriCorps Seniors volunteers. On the AmeriCorps Seniors Pathfinder, interested volunteers begin their search by selecting a state, or by selecting a state and county, to return a list of nearby AmeriCorps Seniors programs. Program listings include organization name, program name, AmeriCorps Seniors parent program (e.g. FGP, SCP, RSVP), counties served, and program address. Most importantly, each listing includes contact information for that specific program. This allows prospective volunteers to ask questions, get the information they need, and begin sooner.

Information in the program listings are drawn from what AmeriCorps Seniors grantees enter into eGrants. The counties listed are associated with active sites in the station roster, as entered by grantees. You can find instructions to update your contact information.
8.3 SELECTION OF AMERICORPS SENIORS VOLUNTEERS

8.3.1 Interviewing Potential AmeriCorps Seniors volunteers
After expressing an interest in volunteering, potential AmeriCorps Seniors volunteers should be scheduled for interviews with AmeriCorps Seniors SCP project staff as soon as possible. The initial interview should be private and confidential, allowing adequate time for discussion. These interviews should be conducted in the most efficient manner for AmeriCorps Seniors SCP staff and the potential volunteer either in person, via phone, or other means such as Skype.

a) The initial interview is the time to become acquainted with and establish a friendly, mutually supportive relationship with the prospective AmeriCorps Seniors volunteer.

b) Interview techniques should relate to project goals and to the background, hobbies, and special interests of applicants.

Suggested interview topics include:

- Roles, assignments, and types of activities.
- Interests of the applicant and motivation to serve.
- Background information on the potential volunteer including work and volunteer history.
- Volunteer cost reimbursements and related responsibilities.
- Income eligibility requirements.
- National Service Criminal History Check requirements (See NSCHC section in this chapter).
- Description of volunteer stations and specific types of assignments currently available.
- Special needs of clients to be served.
- Volunteer benefits and responsibilities.
- Availability of support from professional supervisors
- Availability of transportation arrangements.
- Follow-up support, recognition activities, and newsletter offered by AmeriCorps Seniors SCP.
- Whether the applicant is confident that he or she is able to perform available assignments with, or without, reasonable accommodations.

8.3.2 Determining Income Eligibility
1) During or after the interview the prospective AmeriCorps Seniors volunteers’ income is reviewed for the purpose of establishing eligibility (see Appendix C.6 for a sample income review form). In this review, the project director must ascertain and document the applicant's income from all sources. According to 45 CFR 2551.44, “income” refers to total cash receipts before taxes from all sources, including:

a) Money, wages and salaries before any deduction;

b) Receipts from self-employment or from a farm or business after deductions for business or farm expenses;
c) Regular payments for public assistance, Social Security, Unemployment or Workers Compensation, strike benefits, training stipends, alimony, child support, and military family allotments, or other regular support from an absent family member or someone not living in the household;

d) Government employee pensions, private pensions, regular insurance or annuity payments, and 401(k) or other retirement savings plans; and

e) Income from dividends, interest, net rents, royalties, or income from estates and trusts.

2) For eligibility purposes, income does not refer to the following money receipts:

a) Any assets drawn down as withdrawals from a bank, sale of property, house or car, tax refunds, gifts, one-time insurance payments or compensation for injury;

b) Non-cash income, such as the bonus value of food and fuel produced and consumed on farms and the imputed value of rent from owner-occupied farm or non-farm housing;

c) Regular payments for public assistance including the Supplemental Nutrition Assistance Program (SNAP);

d) Social Security Disability or any type of disability payment; and

e) Food or rent received in lieu of wages.

3) Maintain a volunteer’s initial income eligibility documentation as a grant record. This means it must be maintained until at least three years from the date you submit the final FFR for the project period when the volunteer exits service or three years past the last audit, whichever is later. Chapter 11 on Reports and Recordkeeping for more information.

8.3.3 Income Eligibility Guideline:

1) The income eligibility guideline for each state is 200 percent of the poverty line, as set forth in 42 U.S.C. 9902 (2).

2) Each year, AmeriCorps Seniors publishes the income eligibility guidelines on the AmeriCorps Seniors SCP page for easy access. Use the prior year’s guideline if the current year is not yet published.

3) For new applicants to become stipended AmeriCorps Seniors volunteers, annual income must be projected for the following 12 months, based on income at the time of application.

4) For AmeriCorps Seniors volunteers already serving, annual income is counted for the past 12 months.

5) Annual income includes the applicant or enrollee’s income and that of his or her spouse, if the spouse lives in the same residence. Sponsors must count the value of shelter, food, and clothing, if provided at no cost to the applicant, enrollee, or spouse.
6) Allowable medical expenses are to be deducted from annual income in determining income eligibility. “Allowable medical expenses” are annual out-of-pocket medical expenses for health insurance premiums, health care services, and medications (prescription or over-the-counter) provided to the applicant, enrollee, or spouse which were not and will not be paid by Medicare, Medicaid, other insurance, or other third party, and which do not exceed 50 percent of the applicable AmeriCorps income guideline (45 CFR 2552.43(c)).

a) Long term care insurance premiums are considered to be an allowable medical expense.

7) Once enrolled, an AmeriCorps Seniors volunteer remains eligible to serve and to receive a stipend so long as his or her income does not exceed the prescribed income eligibility guideline by 20 percent. The sponsor must review income eligibility annually. 45 CFR 2551.43(e) (See Appendix C.6 for sample income review form.) To calculate the income eligibility threshold for a currently serving volunteer:

a) Look up the current year’s income eligibility guidelines on the AmeriCorps Seniors SCP page.

b) Multiply the guideline for your state by 20%

c) Add the resulting figure to the guideline to determine the maximum income for stipend eligibility. See the box to the right for an example.

8) When more than one eligible member of a household serves as an AmeriCorps Seniors volunteer, both members are entitled to receive a stipend.

9) See 45 CFR 2551.43-44 for further details

Example: Income Eligibility for a Serving Volunteer

1. Visit the AmeriCorps Seniors SCP page for this year’s income eligibility guidelines. Find the right guideline for an individual based on his or her state and family size.

2. In 2017, the guideline for all states except Alaska and Hawaii for a family unit of one was $24,980.

3. Multiply that by 20%. 20% of $24,980 is $4,996. $24,980 + $4,996 is $29,976.

8.3.4 National Service Criminal History Checks
It is critical that AmeriCorps Seniors sponsors make National Service Criminal History Checks (NSCHC) a priority when hiring project staff and enrolling AmeriCorps Seniors volunteers. Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. Please read this section and the NSCHC webpage carefully to be sure your policies and your implementation procedures are in compliance with the requirement. Grantees should contact their portfolio managers for NSCHC questions or requirement clarification.

8.3.5 NSCHC Overview:
Under the National and Community Service Act of 1990, as amended by the Serve America Act of 2009, all AmeriCorps and AmeriCorps Seniors grantees must conduct NSCHC on grant-funded staff and national service participants that receive a salary, national service education award, living allowance, or stipend under AmeriCorps Seniors grants. This includes both AmeriCorps Senior volunteers in SCP and FGP. Individuals in these positions must undergo the NSCHC process in a timely manner, or the
noncompliant grantee may be subject to cost disallowance. Certain parts of the process must occur prior to charging any staff or volunteer time, to an AmeriCorps Seniors grant. Therefore, it is critical to comply with the NSCHC requirements on time, every time.

The Code of Federal Regulations outlines the Nationals Service Criminal History Check rules and regulations in full at 45 CFR 2540.200–207. Additional information on NSCHC, including the required annual NSCHC e-course, an FAQ document, and links to technical assistance resources can be found on the [NSCHC webpage](#).

AmeriCorps has published a new NSCHC Regulation 45 CFR 2450.200 - .207 (effective May 1, 2021). Please see the [NSCHC Rule Summary](#) document for information on the new rule.

These NSCHC requirements are statutory minimums, and individual grantees can, and often should, supplement these with additional safeguards for vulnerable populations, such as additional screening mechanisms, additional eligibility criteria, a code of conduct, training for staff and volunteers, and a clear system for reporting and handling reports of any harm or potential harm to vulnerable populations resulting from their program. Contact your portfolio managers for more resources on ways to protect your program’s vulnerable beneficiaries.

### 8.3.6 NSCHC Enforcement:

*Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance.* More information on cost disallowance can be found in the [NSCHC Enforcement Guide](#). Grantees that self-report non-compliance to a monitoring official prior to any written notice of future oversight or monitoring activity (such as IPERA sampling, IG audit or investigation, site visit, desk review, etc.) may receive a reduction in their cost disallowance. As a result, it is in an organization’s interest to develop a system for monitoring its own compliance.

### 8.3.7 NSCHC Resources:

[AmeriCorps Knowledge Network/Criminal History Checks](#) for links to the regulations, requirements, and training materials. [Video Training, NSCHC eCourse, FAQs](#), [NSCHC Documentation Checklist](#) is especially helpful to AmeriCorps Seniors grantees.

See [May 1 NSCHC Rule Resources](#) for quick summary, [May 1 NSCHC Rule Training, Rule Summary, Rule Manual, FAQs](#), and [Rule Interim FAQs](#).

## 8.4 SELECTION OF VOLUNTEERS IN AMERICORPS SENIORS SCP

### 8.4.1 Selection Criteria

A full complement of AmeriCorps Seniors volunteers should include a variety of personal skills and strengths. Since the project will be expected to plan a variety of assignments at volunteer stations, emphasis will be on matching a potential AmeriCorps Seniors volunteers with an already planned, suitable, and available assignment.

1) Selection criteria should give priority to eligible older persons who are highly motivated and have the greatest need to serve. Other criteria to consider when selecting AmeriCorps Seniors volunteers include:
2) Interest in and ability to develop a supportive person-to-person relationship with older adults and adults with disabilities on a regular basis;
   a) Ability to serve 5 to 40 hours a week;
   b) Willingness to accept professional supervision; and
   c) Flexibility in accepting assignments particularly in private homes.
3) Ownership of or access to a private automobile should not be a project-wide requirement but may influence selection in sparsely populated areas or for particular assignments.

8.4.2 Selection Documentation

Grantees must document in writing that (1) the applicant’s identity was verified by examining the applicant’s government-issued photo identification card and (2) that the required criminal history checks were conducted. Grantees must maintain the results of the criminal history check in a secure location and document in writing that the grantee considered the results in selecting the applicant.

8.4.3 Individuals Ineligible to Serve

1) AmeriCorps Seniors requirements specify that individuals are ineligible to serve as AmeriCorps Seniors volunteers if they are:
   a) Listed, or required to be listed, on a sex offender registry.
   b) Convicted of murder as defined and described in 18 U.S.C. § 1111. 3.
   c) Unwilling to consent to the NSCHC.
   d) Found to have made a false statement in connection with a program’s inquiry concerning the individual’s criminal history.
2) Grantees may adopt written project policies that include other disqualifying offenses.

8.5 ENROLLMENT OF VOLUNTEERS IN AMERICORPS SENIORS SCP

8.5.1 Enrollment Records

1) Once the selection process is completed, the project staff formally enrolls the AmeriCorps Seniors SCP applicant into the program through the completion of an enrollment form. (See Appendix C.2 for a sample volunteer enrollment form.) Potential AmeriCorps Seniors volunteers must sign and date the form. The form should include designation of beneficiaries for insurance purposes and indication of personal automobile liability coverage, if applicable.

2) Projects must keep documentation for the NSCHC process for each volunteer. NSOPW must be completed and documented prior to individual beginning service as an AmeriCorps Seniors volunteer; documentation showing that the state and FBI checks were initiated prior to individual beginning service; and requirement for accompaniment for individuals with access to vulnerable populations until the project receives state or FBI project results. (Effective May 1, all three checks must be conducted, reviewed, and an eligibility determination made by the grant recipient or subrecipient before a person begins to work or serve on an NSCHC-required grant.) Please read the NSCHC webpage carefully to be sure your policies and your implementation procedures are in compliance with the requirement.
3) Volunteer records should be updated as necessary and at least annually to ensure information is current. (See Appendix C.5 for a sample volunteer information update form. See Appendix C.7 for a sample enrollment checklist.)

4) Maintain enrollment records, including original and annual income eligibility reviews until at least three years from the date you submit the final FFR for the project period when the volunteer exits service or three years past the last audit, whichever is later. These records are critical grant records. See Chapter 11 on Reports and Recordkeeping for more information.

5) At the time of enrollment, AmeriCorps Seniors volunteers may be provided a physical examination or assistance with the cost of a physical examination. See Chapter 9, Volunteer Cost Reimbursements Detailed.

8.5.2 Persons Not Selected to Be AmeriCorps Seniors Volunteers and Reserve AmeriCorps Seniors Volunteers

6) Eligible persons not selected to serve as AmeriCorps Seniors volunteers should be counseled and referred to other community agencies which provide opportunities for older persons, including the Senior Community Service Employment Program, other AmeriCorps programs, and other volunteer organizations.

7) Many projects maintain waiting lists or generalized contact lists to stay in touch with individuals who express interest in serving but are either not selected or not able to volunteer at a given time. These lists may be used to socialize new opportunities.

8) Sponsors may want to plan for more AmeriCorps Seniors volunteers than the number of volunteer service hours to allow for absences, variation in the number of hours served, and attrition. Local experience will provide a sponsor with a more accurate basis for determining reserves. (See Appendix C.8 for a VSY Calculator).

8.6 ORIENTATION AND TRAINING OF AMERICORPS SENIORS VOLUNTEERS

8.6.1 Minimum Requirement
The sponsor must provide a minimum of 20 hours of pre-service orientation to AmeriCorps Seniors volunteers and at least 24 hours annually of in-service training (45 CFR 2551.23(f)).

8.6.2 Examples and Explanation

8.6.2.1 New Volunteers
For each volunteer’s first year of service, the sponsor must provide:

- A minimum of 20 hours of pre-service orientation
- A minimum of 24 hours of in-service training annually.

This requirement must be met within a year of the volunteer’s enrollment, not necessarily in the program year in which the volunteer enrolled in the program. See below for an example.

Note that both the 20 hours of pre-service orientation and the 24 hours of in-service training are minimums. Sponsors may provide orientation and training that exceeds the minimum requirement to
enhance performance of assignments. Stipends may be accrued for all training and orientation activity and cost reimbursements may be provided. For suggestions on content, see Section 8.6.4 on orientation format and content below. Sponsors may also include hours of orientation and training provided by the volunteer station(s) at which the AmeriCorps Seniors volunteer will serve in this requirement.

**Meeting the Requirement for New Volunteers: Example**

Hometown provides two or four hours of in-service training every month, except for in June and July. Their project year runs from January through December, in line with the calendar year. Lily joins the program in October and receives the required 20 hours of pre-service orientation before starting service. She then attends two, two-hour in-service trainings before the end of the project year.

The next project year begins, and Lily continues to attend monthly in-service trainings, and, by the end of October, the sponsor has fulfilled its minimum requirement of at least 24 hours annually of in-service training. It has provided the required 20 hours of pre-service orientation and 24 hours of in-service training in her first year as an AmeriCorps Seniors volunteer, even though this extends across multiple program years. Though the sponsor has met the requirement at this point, she continues to attend in-service trainings regularly. (See table below.)

**New Volunteer Example: Lily**

<table>
<thead>
<tr>
<th>Month and Hours of Orientation/Training</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Program Years</strong></td>
</tr>
<tr>
<td>-------------------</td>
</tr>
<tr>
<td>Year 1</td>
</tr>
<tr>
<td>Year 2</td>
</tr>
</tbody>
</table>

*Lily attends 20 hours of pre-service orientation.*

**At this point (October), the sponsor has provided the minimum amount of training and orientation. They have provided 20 hours of pre-service training, plus 24 hours of in-service training between November and October.***In November and December, Lily attends in-service training regularly as any other volunteer, however she does not need to attend every session offered.***

**8.6.2.2 Existing Volunteers**

After the volunteer’s first year of service, and for each successive year, the sponsor must provide a minimum of 24 hours of in-service training annually to its volunteers.

As with the orientation requirement, this is a **minimum** requirement, and sponsors may exceed it. Due to absences, leave or other issues, individual volunteers may not be able to attend all trainings. In fact, it is a good practice to plan to exceed this requirement, so that unexpected cancellations or changes do not result in a sponsor falling short of its minimum requirement. The sponsor should have reasonable policies and procedures in place that describe what constitutes a sufficient training plan for AmeriCorps Seniors volunteers each year.

This training may be structured in many different ways. You will need to adapt your schedule to match the service activities available to your volunteers and other community factors. See the examples below, which are intended to demonstrate the range of different options available to you, for more information.
Examples

- Hometown program values a predictable schedule and finds that attendance is at its largest when the schedule is the same throughout the year. For this reason, it hosts a two-hour in-service training on the same day each month.

- Neighborhood program has a partnership with a station that requires volunteers to receive certain information every September. They also like to recognize outstanding volunteers at an in-service event each summer, in June. Consequently, they schedule a four-hour in-service training in September and a four-hour in-service training in June. They do not hold a training in December and January, when they find many volunteers are unavailable due to holidays. They hold a two-hour in-service training all other months.

- Township program operates in a rural area with harsh winters that complicates transportation. They also find that service opportunities are fewer in the summer months. As a result, they focus their training and in-service during this time, offering a four-hour in-service training each month over the summer. They do not schedule any for months in winter when transportation is most difficult.

- Hamlet program values a regular schedule, like Hometown, but also faces some of the transportation challenges as Township. They concentrate all of their training between April and September, with four-hour trainings each month. They also include a four-hour training in March and October to ramp up and phase out these training activities. Note that this means they provide more than the minimum requirement, as they may choose to do at their discretion.

In-Service Example: Four Models

<table>
<thead>
<tr>
<th>Program</th>
<th>Jan</th>
<th>Feb</th>
<th>Mar</th>
<th>Apr</th>
<th>May</th>
<th>Jun</th>
<th>July</th>
<th>Aug</th>
<th>Sept</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
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</tr>
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<td>2</td>
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<td>4</td>
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<td>0</td>
<td>24</td>
</tr>
<tr>
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<td>2</td>
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<td>4</td>
<td>4</td>
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<td>0</td>
<td>32</td>
</tr>
</tbody>
</table>

8.6.3 Documenting Orientations and Trainings

Best practices related to documenting orientations and in-service trainings to show adherence to the requirement include maintaining the following types of information:

- A calendar of orientation and training events
- An agenda or schedule
- Sign-in sheets
- Receipts for any supplies purchased
- Invoices or in-kind donation forms for any services used, such as if a professional trainer or subject matter expert is used
8.6.4 Orientations: Format and Content

As explained above, sponsors must provide at least 20 hours of pre-service orientation to new volunteers prior to service. Sponsors should adapt the format and content of orientations to meet the needs of their community and their program model. There is no one ideal orientation. Effective orientations also include content provided directly by the volunteer station(s) at which the AmeriCorps Seniors volunteer will serve. The information below offers suggestions and ideas that may be helpful for many different programs.

8.6.4.1 Objectives

An effective orientation:

- Welcomes volunteers to the national service community, helping them understand their connection to AmeriCorps, AmeriCorps Seniors, other AmeriCorps Seniors volunteers and the American people who support their work.
- Provides critical logistical and compliance information about your program to AmeriCorps Seniors volunteers and conveys information on project policies, including annual and sick leave, holidays, service schedules, termination, appeal procedures, and cost reimbursements like meals and transportation. Project procedures related to timesheets, insurance, and other administrative details should also be clearly explained.
- Introduces AmeriCorps Seniors volunteers to each other and the people and organizations who will support them, including sponsor staff, station staff and others.
- Prepares AmeriCorps Seniors volunteers to fill their role, including understanding their potential activities and the special and exceptional needs of the individuals they will serve.
- Shares information about available community services that will help AmeriCorps Seniors volunteers help themselves and ultimately serve their clients better.

8.6.4.2 Topics and Structure

Develop your orientation with help from sponsor and volunteer station staff, as well as child development and other relevant professionals. Daily group training over a one- to two-week period provides efficient use of community resources and promotes team building among volunteers. Projects have found that a combination of formal orientation and hands-on experience with volunteer stations works well. This gives greater meaning to the orientation and aids new volunteers’ adjustment to their assignments. Consider including current AmeriCorps Seniors volunteers in the design, execution, and continuous improvement of your orientation.

The specific information you will cover may vary based on your community and project’s needs, but most projects tend to cover some combination of the topics listed below in the pre-service component of their orientation. Review the section below on adult learning principles for some ideas on how to make the experience engaging and effective for your learners.

- **Introductions:** Introduce your new volunteers to each other and to important individuals in your program, such as sponsor and station staff. This can be done in a dedicated session or spaced out through various activities throughout the orientation.
• **Welcome to the National Service Community:** Help AmeriCorps Seniors volunteers recognize their role as part of the nationwide national service community. Consider using some of the videos or other materials on AmeriCorps and AmeriCorps Seniors available on the [AmeriCorps website](https://www.americorps.gov).

• **The Role of the AmeriCorps Seniors volunteers in SCP:** What will the AmeriCorps Seniors volunteers do? What are some concrete examples? What activities are appropriate and inappropriate? Consider having current AmeriCorps Seniors volunteers share their experience.

• **Team-Building Exercises:** Have your AmeriCorps Seniors volunteers work together to solve problems and build trust, helping create a cohesive, supportive community of volunteers.

• **Strategies and Tactics for Working with Older Adults with Special Needs:** You could spend a significant amount of time on this topic and the most relevant activities will depend on the structure of your specific program. This is a great opportunity to involve stations and other eldercare specialists. Possible items to address include working with caregivers, protecting older adults from financial abuse or recognizing and responding to early signs of dementia. You could also consider spending time acquainting AmeriCorps Seniors volunteers with the specific special needs they might encounter among the clients they serve.

• **Policies and Procedures:** Be sure to address your AmeriCorps Seniors SCP program’s major rules and logistical systems, such as assignment plans, service policies and appeal procedures, timesheets, reimbursement for meals and transportation, and insurance. Consider spacing out this information out throughout the orientation period and provide opportunities for questions and for volunteers to practice key activities, like completing timesheets. Be sure to include information about prohibited activities. (See Chapter 2 of this Handbook.)

• **Code of Conduct, Mandatory Reporting and Elder Advocacy:** Explain what you expect of your volunteers when they interact with vulnerable older adults. Depending on your state, AmeriCorps Seniors volunteers may also have specific responsibilities for reporting known or suspected abuse. At a minimum, you should prepare them to be able to discuss a client’s physical and mental health with caregivers and station supervisors.

• **Support for AmeriCorps Seniors volunteers:** Introduce your new volunteers to services or information that you can provide them to help with their own needs. Your volunteers will want to feel supported, and this, in turn, will help them remain committed to your program. Remember that orientation is part of the recruitment process – you want to be sure they understand why it’s a good idea to stick with your program.

• **Graduation:** Recognize your new volunteers for completing the process. This is another great opportunity to involve current AmeriCorps Seniors volunteers to help welcome them into the group. Consider presenting them with a certificate or branded gear from your program.

Most programs continue new volunteers’ orientation by pairing them with experienced AmeriCorps Seniors volunteers (often called “shadowing”) for a period of time before giving new volunteers their own assignments. This is strongly recommended when possible. This allows new volunteers to see the practical aspects of a program; meet station staff, clients, and caregivers with a supportive volunteer next to them; and ask additional questions of existing AmeriCorps Seniors volunteers.
Consider checking in with the group again after they have some in-service experience to address new questions and hear about their early experiences. Finally, ask for your volunteers’ feedback following the orientation process so you can keep improving.

8.6.5 In-Service Trainings: Format and Content

As with orientations, sponsors should adapt the format and content of in-service trainings to meet the needs of their community and their program model. There is no one ideal set of content for in-service trainings. The information below offers suggestions and ideas that may be helpful for many different programs.

8.6.5.1 Objectives

An effective in-service program:

- Provides AmeriCorps Seniors volunteers opportunities to build knowledge and skills that help them effectively serve young people
- Reinforces key project policies, procedures and systems to help AmeriCorps Seniors volunteers contribute to an efficient, compliant, responsible program
- Keeps AmeriCorps Seniors volunteers engaged and connected to the program
- Gives AmeriCorps Seniors volunteers access to information and services that allow them to stay healthy and active
- Recognizes AmeriCorps Seniors volunteers for their service
- Meets the needs of AmeriCorps Seniors volunteers, as identified by the AmeriCorps Seniors volunteers themselves

8.6.5.2 Potential Topics and Structure

For an overview of different ways to allocate and schedule in-service time, see the beginning of this section, which explains the minimum requirement.

Once you have determined your in-service schedule, you can combine multiple topics and approaches for diverse, enriching sessions. Try to include a mix of different types of activities in each. You might, for example, start with 30 minutes of reflection and small group conversations, followed by a more formal hour-long training on a specific topic, followed by a period of activities to practice. You could then close with recognition and reminders. Varying the format and structure of your in-services will incentivize participation and make them more effective.

Some potential topics you could include are:

- **Strategies and Tactics for Working with Older Adults with Special Needs:** This could take many different forms depending on your program. If your program provides support to caregivers, consider helping AmeriCorps Seniors volunteers build strong relationships with these caregivers. If it focuses on helping clients remain active and healthy, focus there. Use your stations and other community partners to help provide and contribute content.

- **Coaching and Problem-Solving:** Have volunteers share success stories or challenges and discuss them with the group. How can your volunteers help each other?
• **Resources for Volunteers**: Engage community partners who can share resources with your AmeriCorps Seniors volunteers to help them with their own needs. This, in turn, will help them be more effective in your program.

• **Program Rules and Procedures**: It never hurts to remind your volunteers about the details that make your program run. Consider refreshers on key policies or setting time aside to help them with key tasks, like updating important forms.

• **Recognition**: Build a sense of community and partnership among your AmeriCorps Seniors volunteers, while also allowing volunteers to model exemplary behavior. Recognize volunteers for accomplishments and milestones and giving them opportunities to recognize each other.

### 8.6.6 Introduction to Adult Learning Principles

Familiarity with some basic concepts about how adults learn can help make your orientations and trainings as effective as possible. You likely already have some basic knowledge of these, based on your own experiences.

Think about the kind of training that you prefer. It’s likely that you learn best when a few things are true:

- You understand why what you’re being taught is important
- You have time to apply what you’re learning, ask questions and get involved
- You can share your own experience and learn from the experience of others who’ve dealt with similar challenges
- The style of training provided matches your needs – if you’re a visual learner, there are some visuals. If you’re an auditory learner, you have a chance to listen.

Your volunteers will appreciate these same tactics in orientation and in-service training. A number of researchers have studied how adults learn and identified a few key principles that allow adults to learn effectively. Though stated in different ways over the years, they can be boiled down to a few key concepts:

- **Choice**: Adults don’t like being told what to do! Most adults are used to choosing their own activities and managing their own experiences. It’s uncomfortable to surrender that sense of agency when an adult enters a training space. That discomfort can mean that your learners are thinking about how they don’t want to do a certain activity, rather than the information you want to share. Practically, this means offering learners choices in their activities and getting buy-in from learners. Think about tactics like asking learners what they want to get out of a session before it begins and tailoring the session to those ideas. You can also involve learners in the design of your sessions. For example, invite current AmeriCorps Seniors volunteers to shape your orientation.

- **Relevance**: This is closely related to choice. Adults learn best when they clearly understand why it is in their interest to learn certain information. Practically, you can make the objectives of all your sessions and activities clear so that learners understand the “why” behind the “what.” Using current AmeriCorps Seniors volunteers can be helpful here as well, to point out when specifically, a learner might need specific knowledge or skills.

- **Experience**: Adults – particularly older adults – have a lot to share! They learn best when they have opportunities to share their wisdom. This has other benefits too, of course, in that it allows other learners to gain that knowledge. Though your learners may be new to being AmeriCorps
Seniors volunteers or a particular topic, chances are that they have some experience with something similar – such as supporting relatives or friends with similar needs or working in teams with other older adults. Practically, this means asking almost as many questions of your learners as they ask of you! Encourage them to share with each other in small groups and in a large group setting, and explicitly acknowledge the expertise they bring to a conversation.

- **Application:** Adults learn best by practicing what they have learned. Incorporating activities allows learners to apply knowledge themselves and make connections to real-world situations. Practically, this means offering frequent opportunities for learners to interact with material. Consider including role-playing activities or asking participants how they would react to specific scenarios. Many trainers use a “Learn, Do, Teach” framework, where they explain a concept, have learners apply the concept, and then ask the learners to try to explain the concept to someone else, such as a peer. This principle also means that learning often continues after a formal “training,” when your learners go out into the real world. Consider including time for reflection regularly to reinforce new ideas and concepts.

- **Repetition:** Adults don’t remember everything they’re told the first time. This is just human nature – in any training, expect your learners to only remember a small portion of the information you share exactly. Practically, this means not only that you should repeat key concepts within a training, but also that you should give learners tools to remind themselves. Referencing handbooks and other tools that learners have after the fact is a great practice for adult learning. Also consider explicitly pointing out the 2-3 most important pieces of information in a session by saying something like, “If you remember nothing else from the past hour, remember…” Reviewing information both at the end of a session and in later follow up activities also helps learners retain more.

There are many resources available online if you would like to learn more about adult learning. The Northwest Center for Public Health Practice has created a very helpful Adult Learning Toolkit that is useful for many topics beyond public health. Facilitating Adult Learning by Dr. Lela Vandenberg offers lots of great practical tips as well.

### 8.7 SERVICE REQUIREMENTS

The AmeriCorps Seniors SCP program regulations on terms of service are found in 45 CFR 2551.51 through 2551.53.

#### 8.7.1 Weekly Hours Requirement

AmeriCorps Seniors volunteers shall serve a minimum of 260 hours annually, or a minimum of 5 hours per week. An AmeriCorps Seniors volunteer may serve a maximum of 2080 hours annually, or a maximum of 40 hours per week. Within these limitations, a sponsor may set service policies consistent with local needs.  

[45 CFR 2551.51](https://www.federalregister.gov/a/2022-11932)

The sponsor should develop a variety of volunteer stations that afford opportunities for year-round placements, nine-month placements, summer placements, and various weekly scheduling requirements.
In addition, sponsors may choose to abide by either the hourly or annual minimums. A sponsor must also document how it chooses to meet the requirement above in local policies that define hours of service for volunteers and the sponsor must implement its policies consistently.

8.7.2 Travel Time, Mealtime, Training, Official Meetings, Recognition
Travel time between the AmeriCorps Seniors’ home and place of assignment may not be considered part of the service schedule and is not stipended. Travel time between individual assignments is part of the service schedule. Mealtime may be part of the service schedule and is stipended. Additionally, attendance at pre-service orientation, in-service training, AmeriCorps Seniors SCP advisory council meetings, physicals (if applicable) and recognition events are also considered official project activities or events. Hours served in support of these activities or events count toward the minimum and maximum service requirements and volunteers should receive stipends for them, consistent with sponsor policies and procedures.

8.7.3 Sponsor Service Policies
Service policies must be provided in writing to AmeriCorps Seniors volunteers. These policies should include, but are not limited to, probationary periods, criminal history checks, resignations, annual and sick leave, holidays, service schedules, prohibited activity, meal and travel reimbursements, and appeal procedures. The policies should also cover the volunteer’s annual performance appraisal, and annual income review.

Sponsors should set policies that define leave in accordance with all applicable regulations. When developing leave policies, sponsors should consider applicable rules and regulations that may impact volunteer management, like the hours of service requirement, criminal history check requirements, etc.

8.7.4 Volunteer Separation
A sponsor may separate a volunteer for cause, including but not limited to, extensive or unauthorized absences, misconduct, inability to perform assignments, or having income in excess of the eligibility level. Separation should not occur until the AmeriCorps Seniors volunteer is given an opportunity to file a grievance and/or appeal the action in accordance with the sponsor’s service policy. [45 CFR 2551.53]

8.8 Effective Practices in Managing AmeriCorps Seniors Volunteers

I. Effective Practices to Ensure Satisfaction among AmeriCorps Seniors Volunteers in Their Service to the Community

The project builds a spirit of commitment among the volunteers by:

A. Ensuring that AmeriCorps Seniors volunteers have opportunities to express their concerns, interests, and observations about the project to the staff of the project and the volunteer station;

B. Involving AmeriCorps Seniors volunteers in the operation and appraisal of assignments and project operations;

C. Soliciting comments and/or recommendations from the AmeriCorps Seniors volunteers related to their experiences in serving clients, and incorporating relevant information into the project as applicable;
D. Adopting specific strategies to retain a diverse group of AmeriCorps Seniors volunteers; and
E. Identifying and promptly addressing any issues or problems that impact the retention of AmeriCorps Seniors volunteers from a broad range of backgrounds.

II. Effective Practices to Help AmeriCorps Seniors Volunteers Develop Their Capacity to be Community Leaders and Spokespersons

The project:
A. Encourages the volunteers to recognize and take pride in the value of their service to the community;
B. Provides AmeriCorps Seniors volunteers opportunities to serve in leadership roles and develop leadership skills that enhance their personal lives and the project, such as serving on the Community Advisory Group;
C. Provides opportunities for AmeriCorps Seniors volunteers to facilitate training with other AmeriCorps Seniors volunteers using a standard training format with learning objectives as ways to measure progress;
D. Involves AmeriCorps Seniors volunteers in promoting the project to the community, such as through media appearances; and
E. Acknowledges and values the strengths and skills of AmeriCorps Seniors volunteers through ensuring that assignments are challenging and match the AmeriCorps Seniors volunteers’ interests and abilities.

III. Effective Practices for Acknowledging the Contributions of AmeriCorps Seniors Volunteers

The sponsor and project director:
A. Plan and implement individual and group recognition activities;
B. Ensure that volunteer stations regularly recognize AmeriCorps Seniors volunteers as contributors to the stations’ ability to deliver services;
C. Provide at least one annual recognition event for AmeriCorps Seniors volunteers which has significant community support and involvement;
D. Recognize, document, and publicize outstanding AmeriCorps Seniors volunteer achievement;
E. Consider collaborating with other area AmeriCorps Seniors programs on recognition efforts; and
F. Consider non-traditional forms of recognition, especially for culturally diverse and Boomer volunteers.
9 **AMERICORPS SENIORS VOLUNTEER COST REIMBURSEMENTS**

AmeriCorps Seniors volunteers are provided with cost reimbursements and other benefits. Within the limits of a project’s approved budget, and in accordance with 45 CFR 2551.43 and any written AmeriCorps Seniors policy guidance to projects, volunteers are provided transportation, meals, accident and liability insurance, physical exam (if applicable), uniforms when appropriate, and recognition activities. Cost reimbursements are budgeted as “Volunteer Expenses,” and the two terms may be used interchangeably.

9.1 **ADMINISTRATION OF COST REIMBURSEMENTS**

Sponsors should establish written cost reimbursement policies and procedures and provide these to each volunteer. Orientations and in-service trainings are ideal times to provide these to volunteers and discuss them. The amount of reimbursement for non-stipend cost reimbursements made to AmeriCorps Seniors volunteers is determined by the availability of funds and project’s written policy regarding reimbursement of volunteer expenses.

9.1.1 **Assignment-Related Expenses**

Project funds may be used to reimburse volunteers for expenses, including transportation costs, incurred while performing their volunteer assignments, provided that these expenses are described in the MOU with the volunteer station and there are sufficient funds available to cover these expenses and meet all other requirements identified in the Notice of Grant Award. [45 CFR 2551.46] Otherwise, such expenses are the responsibility of the volunteer station.

9.1.2 **Income Disregard Memo**

Cost reimbursements are not subject to any tax or charge. Cost reimbursements may not be treated as wages or compensation for the purposes of unemployment insurance, temporary disability, retirement, public assistance, workers’ compensation, or similar benefit payments or minimum wage laws. [45 CFR 2551.47] See [Guidance from the Office of General Counsel - Income Disregard](#) for a memo discussing the provision of the Domestic Volunteer Service Act that requires, in most cases, government agencies to disregard payments to AmeriCorps Seniors volunteers when determining their eligibility for assistance and benefits. Please note that this memo need not be updated annually and that, once signed, it is effective unless revoked or superseded. This document was most recently updated in 2018.

9.1.3 **Reimbursement Policies**

The amount of reimbursement made to AmeriCorps Seniors volunteers is determined by the availability of funds and project’s written policy regarding reimbursement of Volunteer Expenses. The procedure and the limits for volunteers to request reimbursement should be identified in volunteer orientation sessions and project service policies.

9.1.4 **Non-Reimbursed Volunteer Expenses**

Volunteer Expense items, including transportation to and from their assignments, meals taken during assignments, recognition activities, and recognition items, which are purchased at the volunteers’ own expense and not reimbursed by the project to the volunteer, are not allowable as contributions to the non-Federal share of the budget.
9.1.5 Non-AmeriCorps Funded AmeriCorps Seniors volunteers

AmeriCorps Seniors volunteers whose stipends are funded with non-AmeriCorps Seniors resources are entitled to all benefits to which AmeriCorps Seniors-funded AmeriCorps Seniors volunteers are entitled. [45 CFR 2551.102]

9.1.6 Non-Stipended AmeriCorps Seniors volunteers

Sponsors must provide non-stipended AmeriCorps Seniors volunteer cost reimbursements, except for the stipend, that stipended AmeriCorps Seniors volunteers receive, as they should be treated equally (45 CFR 2551.102(c)). However, statute prevents federal funding or non-federal match from being used to support non-stipended volunteer cost reimbursements such as meals, transportation, and physical examinations (if applicable) (42 U.S.C. 5011(4)). Sponsors should budget locally generated contributions that exceed the required non-federal match in their budget’s excess column to pay for non-stipended volunteers’ cost reimbursements (42 U.S.C. 5011(4)). If sponsors need more guidance on budgeting for non-stipended volunteers, they should contact their portfolio managers.

9.2 VOLUNTEER COST REIMBURSEMENTS DETAILED

9.2.1 Stipend

AmeriCorps Seniors volunteers serve from 5 to 40 hours a week. The stipend is a payment to AmeriCorps Seniors volunteers to enable them to serve without cost to themselves. [45 CFR 2551.12(v)]

The stipend is paid for the hourly service schedule that AmeriCorps Seniors volunteers spend with assigned clients, for earned leave if applicable, and for attendance at official project events, e.g., orientation, in-service training, Advisory Council meetings (as members or official observers), recognition events, and travel time between individual assignments. Travel time between the volunteer’s home and place of assignment may not be considered as part of the service schedule and is not stipended. However, travel time between assignments is a part of the service schedule. Mealtime may be part of the service schedule. [See 45 CFR 2551.45(a) and 45 CFR 2551.52.]

9.2.2 Transportation

9.2.2.1 General Principles and Practices

1) AmeriCorps Seniors volunteers may receive assistance with the cost of transportation to and from volunteer assignments and official project activities, including orientation, training, physicals, and recognition events. [45 CFR 2551.46]

2) It is suggested that the project work with its advisory council to prepare a transportation plan. Such a plan should be sound and reasonable, based on lowest-cost transportation modes, and include scheduling, modes of transportation, criteria for reimbursement, mileage rates, and patterns of transportation.

3) Consideration should be given to volunteers who do not own cars or may prefer not to drive and can only participate in the program when other arrangements and modes of transportation are developed.
4) Transportation should be considered when deciding where volunteers are assigned. Convenient and less costly transportation is promoted when assignments are developed in areas close to where AmeriCorps Seniors volunteers live.

5) It is important to consider both costs and convenience, as well as volunteer service schedules, in developing a cost-effective travel solution.

6) Transportation provided by volunteers that has not been reimbursed to the volunteer cannot be used as a local contribution to the project budget.

7) Parking fees for volunteers having to park at a volunteer station or at an official AmeriCorps Seniors SCP function may be budgeted. Parking costs are allowable as a local in-kind contribution only if they are normally charged.

8) AmeriCorps Seniors volunteers and volunteer station staff are required to sign a statement certifying that transportation costs to be reimbursed to the volunteer were in conjunction with volunteer service and to provide details of the reimbursement. Vouchers are subject to review for compliance monitoring and AmeriCorps Seniors audit purposes.

9) Projects may incorporate volunteer expense claims on the timesheet form. Costs must be verified by signatures of the volunteer, the volunteer station supervisor, and designated AmeriCorps Seniors SCP staff. (See Appendix C.3 for a sample Volunteer Timesheet and Mileage Request form.)

9.2.2.2 Reimbursement for Volunteers’ Transportation

Volunteer Drivers

1) Reimbursement of AmeriCorps Seniors volunteers who drive their own cars is based on a cost-per-mile rate set by the sponsor via written policy. Volunteers are reimbursed for actual mileage within the limits of available funds and local project reimbursement policy. Volunteers cannot be reimbursed in excess of actual costs, or on a per capita basis, for transporting other volunteers. (See Appendix C.3 for a sample Volunteer Timesheet and Mileage Request form.)

2) Mileage reimbursement directly to an AmeriCorps Seniors volunteer from a volunteer station for transportation from the volunteer’s home to the place of assignment and return home is acceptable as local support of the AmeriCorps Seniors SCP project. Project files should include verification of this contribution for review for compliance monitoring and AmeriCorps Seniors audit purposes.

3) Mileage reimbursement to AmeriCorps Seniors volunteers from volunteer stations for providing transportation while on volunteer assignments cannot be used as local support of the AmeriCorps Seniors SCP project. AmeriCorps Seniors SCP cannot accept responsibility for the costs of community service provided by volunteer stations and, therefore, cannot be credited for the value of those costs to be used as local budget support.

Carpool Drivers

Drivers of carpools receive reimbursement for actual mileage based on a cost-per-mile rate. Passengers do not receive reimbursement.
Public Transportation Users

Sponsors should establish procedures, such as a voucher system, for reimbursing volunteers for public transportation expenses, including subways, buses, and other public conveyances. Reimbursements must be based on documentation by the volunteer of actual costs incurred for project-related transportation expenses.

Certification and Documentation

AmeriCorps Seniors volunteers and volunteer station staff are required to sign a statement certifying that transportation costs to be reimbursed to the volunteer were in conjunction with volunteer service and to provide details of the reimbursement. Projects may incorporate volunteer expense claims on the timesheet form. Costs must be verified by signatures of the volunteer, the volunteer station supervisor, and designated AmeriCorps Seniors SCP staff. Vouchers are subject to audit. (See Appendix C.3 for a sample timesheet that incorporates hours of service, mileage, and meal expenses.

Other Transportation Reimbursement Considerations

1) The purchase cost, operation, and maintenance of vans, mini-buses, or station wagons may be budgeted only if they provide the most flexible and economical transportation available.

2) Project vehicle costs, vehicle driver's salary and fringe benefits, and vehicle insurance are budgeted as travel costs under volunteer expenses in the AmeriCorps Seniors SCP project grant application.

3) Contracted transportation, if it is the most flexible and economical mode, may be budgeted for volunteers.

4) Volunteers who do not incur travel expenses (e.g., those who walk to assignments, ride on free public transportation, or are passengers in carpools) do not receive reimbursement.

9.2.3 Meals

Within the limits of available resources and project written policy, AmeriCorps Seniors volunteers receive assistance with the cost of meals taken during their service schedule. [45 CFR 2551.46(e)] Project staff arrange for or assist with the cost of meals for AmeriCorps Seniors volunteers during orientation and training.

Project directors should make special efforts to reach an understanding with volunteer stations to provide meals for AmeriCorps Seniors volunteers. In general, these meals may be used as local support in the budget, provided there is sufficient documentation.

In-Home Meal Options

Meal arrangements may become more difficult for volunteers with in-home assignments. Volunteers who plan to eat between assignments may be far removed from nutrition centers and volunteer stations which have meal facilities. Some options are for AmeriCorps Seniors volunteers to share a meal with a client, bring their own “brown bag” lunch, or eat at a restaurant and be reimbursed for the cost of their meal. Written procedures should be in place to outline the project’s reimbursement policy. Meals provided by or to clients served are not an allowable budget cost.
Title III of the Older Americans Act
Local congregate nutrition programs, funded under Title III of the Older Americans Act, operate in some public and private non-profit organizations. AmeriCorps Seniors volunteers over 60 are eligible for meals at congregate meal sites funded under that program. See Paragraph (5) (b) in Section 10.3.2 of this Handbook for more information on when programs funded by a federal agency other than AmeriCorps may be included in a grant’s non-federal share.

Reimbursement to Volunteers
The amount of reimbursement to volunteers for meals is normally based on actual expenses, consistent with costing procedures developed by the sponsor rather than a flat daily rate. However, reimbursement of “brown-bag” lunches prepared by AmeriCorps Seniors volunteers may be based on a flat rate as established by the sponsor in its written policy. The basis for the rate should be included in the grant application budget narrative. AmeriCorps Seniors volunteers and volunteer station staff are required to certify that meals to be reimbursed to the volunteer were taken in conjunction with volunteer service and to provide details of the reimbursement. This documentation must be approved by AmeriCorps Seniors SCP staff and is subject to review for compliance monitoring and AmeriCorps audit purposes. (See Appendix C.3 for a sample form for volunteers to use to request reimbursement for meals.)

9.2.4 Insurance
The program regulations require AmeriCorps Seniors volunteers be provided with accident insurance, personal liability insurance, and excess automobile liability insurance [45 CFR 2551.25(f)]. The minimum levels of this insurance are specified by AmeriCorps Seniors and may be subject to change from time to time. See Appendix A.10: AmeriCorps Seniors Minimum Insurance Requirements for minimum coverage levels.

The insurance coverage must be in excess of and noncontributing to any other valid and collectible insurance the volunteers have. In other words, the accident and excess automobile liability coverage are intended to provide higher levels of insurance for volunteers, starting where other insurance coverage for them stops. The AmeriCorps Seniors required insurance is excess insurance not primary insurance. This is also true for personal liability; but volunteers are often not covered by personal liability insurance, in which case the AmeriCorps Seniors-required personal liability insurance shall become primary insurance with no deductible conferred to or paid by volunteers.

1) Accident Insurance
Accident insurance covers AmeriCorps Seniors volunteers for personal injury during travel between their homes and places of assignment, during their volunteer service, during meal periods while serving as a volunteer, and while attending project-sponsored activities, such as recognition activities, orientation, and AmeriCorps Seniors SCP advisory council meetings.

Protection shall be provided against claims in excess of any benefits or services for medical care or treatment available to the AmeriCorps Seniors volunteers from other sources, such as health insurance coverage.
2) **Personal Liability Insurance for Volunteers**

Protection is provided against claims in excess of protection provided by other insurance. Such protection does not include professional liability coverage. The sponsor must provide third-party protection for volunteers against injury or property damage claims arising out of their volunteer service activities. Some insurance providers refer to this as “volunteer liability insurance”. For each sponsoring organization, the amount of protection must meet or exceed the minimum levels of this insurance as specified by AmeriCorps Seniors. See Appendix A.10: AmeriCorps Seniors Minimum Insurance Requirements for minimum coverage levels.

3) **Excess Automobile Liability Insurance**

To avoid a gap in coverage between that provided by the AmeriCorps Seniors volunteer's personal vehicle insurance and liability claims in excess of that coverage, the sponsor must provide Excess Automobile Liability Insurance coverage for bodily injury and/or property damage. See Appendix A.10: AmeriCorps Seniors Minimum Insurance Requirements for minimum coverage levels.

**NOTE:** It is recommended that projects verify that volunteer drivers have valid licenses and basic liability insurance.

4) **Liability Insurance on Personal Vehicles of Volunteers**

Automobile liability insurance is a volunteer's personal expense and is not reimbursable to the volunteer by the project. AmeriCorps Seniors volunteers who use their personal vehicles to drive in connection with project-related activities must keep their automobile liability insurance in effect for their own protection. The volunteer's personal vehicle liability insurance must equal or exceed the limits of the state Motor Vehicle Financial Responsibility Law in their state.

9.2.5 **Physical Examination**

AmeriCorps Seniors volunteers may be provided a physical examination or assistance with the cost of a physical examination prior to assignment and periodically thereafter if sponsors elect to provide this benefit. While a physical examination is not required and may not be determinative of a volunteer’s ability to serve, it is an allowable grant expense (45 CFR 2551.46(f)) (See Appendix C.12 for sample physical form.)

1) If physical examinations are provided as a benefit for volunteers, documentation of the exams must also be retained by the sponsor. The documentation must be maintained until at least three years from the date a sponsor submits the final FFR for the project period when the volunteer exits service or three years past the last audit, whichever is later. See Chapter 11 on Reports and Recordkeeping for more information.

2) Project staff may negotiate with volunteer stations, local health units, public health departments, or private physicians to provide physical examinations to AmeriCorps Seniors.
Seniors as non-Federal, in-kind project support. It may be explained that AmeriCorps Seniors allows such annual examinations as a benefit to the volunteers in AmeriCorps Seniors SCP.

9.2.6 Uniforms or Smocks
When volunteer stations require AmeriCorps Seniors volunteers to wear special uniforms or smocks, the cost of uniforms and laundering are an allowable project cost when these expenses are described in the Memorandum of Understanding with the volunteer station, sufficient funds are available to cover these expenses, and all other requirements identified in the Notice of Grant Award are met. Otherwise, volunteer stations are responsible for such costs.

9.2.7 Clothing and Branded Gear
Many AmeriCorps Seniors grantees want to use clothing to highlight the volunteers’ participation in the AmeriCorps Seniors program. Items like clothing, bags, hats, or other gear with the AmeriCorps Seniors program names and logos that are not required by the project or volunteer station are considered recognition of service and should be categorized in the recognition budget line item rather than the uniform line item.

9.2.8 Recognition
Appropriate recognition for service is to be provided for AmeriCorps Seniors volunteers. [45 CFR 2551.46] Recognition covers a wide range of potential costs; any costs charged to this direct benefit to the volunteer must be in accordance with the applicable OMB cost principles and using sound business practices. Any costs charged to recognition should be reasonable and prudent, properly valued, and consistent with the sponsoring organizational accounting practices. Consideration should also be given to the appropriateness of the expenditure. (See Appendix A.1 for Guidance for Recognition Costs.)

1) At least annually the sponsor plans and arranges for recognition of volunteers for their service to the community. Recognition often includes large, formal annual events. It may also include informal recognition methods throughout the year. Sponsors may also recognize local individuals and agencies or organizations for significant activities that support project goals. AmeriCorps Seniors does not supply volunteer recognition materials, nor does it require specific recognition materials.

2) Informal recognition ought to be ongoing, such as listening to and acting upon recommendations by AmeriCorps Seniors volunteers, offering honest praise, and providing assignments that are increasingly satisfying.

3) Recognition events may consist of special ceremonies, teas, breakfasts, luncheons, and recreational outings at which pins and certificates for stipulated terms of service are awarded.

4) The AmeriCorps Seniors SCP advisory council and volunteer stations are expected to participate in recognition activities. Community contributions in support of recognition activities can enhance the quality of the events. Contributions need not be monetary. Donated space, food, decorations, and transportation should be encouraged. Proper documentation is required to use donations as local support.
5) To emphasize the importance of the occasion, AmeriCorps regional, and headquarters staff, as well as city and county officials and officers of local organizations may be invited to recognition events.

6) Entertainment expenses (e.g. bands, alcohol) are unallowable expenses and cannot be charged to the federal or non-federal share of the budget.

9.3 LEGAL REPRESENTATION
Legal counsel may be retained, and counsel fees, court costs, bail, and other expenses incidental to the defense of an AmeriCorps Seniors volunteer may be paid, in a criminal, civil, or administrative proceeding when such a proceeding arises directly out of performance of the AmeriCorps Seniors volunteer's activities. 45 CFR Part 1220 sets forth the circumstances under which AmeriCorps Seniors may reimburse for such expenses. Consult the AmeriCorps portfolio managers for guidance.
10 GRANTS MANAGEMENT

10.1 INTRODUCTION TO GRANTS MANAGEMENT

10.1.1 Basic Requirements

Sponsors must manage grants awarded to them in accordance with all applicable AmeriCorps Seniors SCP Program Regulations (45 CFR 2551), the Notice of Grant Award (NGA) as well as the Terms and Conditions for AmeriCorps grants. Contact the appropriate portfolio managers for additional technical assistance on fiscal management of an AmeriCorps Seniors SCP grant.

Financial Management Training

An on-line course, “Key Concepts of Financial Management,” which can be accessed on Litmos, provides a basic introduction to grants management considerations applicable to all grantees.

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<thead>
<tr>
<th>Topic</th>
<th>Purpose</th>
<th>For all NFE (Non-federal entities)</th>
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<tr>
<td>Uniform Administrative Requirements</td>
<td>Standards of consistency and uniformity of grants to various institutions</td>
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<td>Cost Principles</td>
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<td>Audits</td>
<td>Standards for obtaining consistency and uniformity among Federal agencies for the audits of states, local governments, and non-profit organizations expending Federal awards.</td>
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In accordance with Uniform Administrative Requirements, 2 CFR 200.302, Non-Federal Entities (NFE) that receive AmeriCorps Seniors SCP grant funds are required have financial management systems that provide for the following:

- Identification, in its accounts, of all federal awards received and expended and the federal programs under which they were received.

- Accurate, current, and complete disclosure of the financial results of each federal award or program in accordance with the reporting requirements set forth in 2 CFR 200.327 - Financial reporting and 2 CFR 200.328 - Monitoring and reporting program performance.
• Records that identify adequately the source and application of funds for federally funded activities
• Effective control over, and accountability for, all funds, property, and other assets.
• Comparison of expenditures with budget amounts for each federal award.
• Written procedures to implement the requirements of 2 CFR 200.305 - Payment.
• Written procedures for determining the allowability of costs in accordance with 2 CFR Part 200 Subpart E—Cost Principles and the terms and conditions of the federal award.

10.1.2 Cost Control and Budget Monitoring
Project support provided under an AmeriCorps Seniors SCP grant must be furnished at the lowest possible cost consistent with the project’s effective operation of the project as described in the AmeriCorps Seniors SCP Program Regulations. (45 CFR 2551.93(b)). Project directors should work with the sponsor’s fiscal staff and regularly compare the budget to actual costs.

10.1.3 Budgeting Costs
Project costs for which grant funds are budgeted must be reasonable and justified as being essential to project operation. “Grant funds” refers to both the AmeriCorps Seniors share and the required non-federal share of the grant.

1) Specific costs are either allowable or unallowable. Only allowable costs may be included in the AmeriCorps Seniors share or the grantee share of the budget. Only amounts approved by AmeriCorps Seniors may be expended.

2) Notices of Grant Award, as well as the AmeriCorps Seniors SCP Program Regulations (45 CFR 2551.93), incorporate the OMB “OMB Guidance for Grants and Agreements” found at 2 CFR Chapter I, and OMB “OMB Cost Principles” found at 2 CFR Part 200, Subpart E. OMB Cost Principles distinguish between costs that are allowable and costs that are not allowable for all federal grants. Grantees should review 2 CFR Chapters I and II and refer to specific regulations within 2 CFR Chapters I and II as needed. OMB Cost Principles apply to funds included in the grant as part of the AmeriCorps Seniors share and also apply to the required non-federal share. Conversely, the OMB Cost Principles do not apply to funds that are not included in the grant as part of the AmeriCorps Seniors share or are not included in the required non-federal share. Also, the OMB Guidance for Grants and Agreements, does not apply to funds budgeted as Excess non-federal or to other sponsor resources outside the grant. Therefore, it is recommended that all allowable costs be budgeted in the “AmeriCorps Seniors Share” or “Non-AmeriCorps” share of the budget.

3) Additional requirements in the AmeriCorps Seniors SCP Program Regulations also determine cost allowability. Below are listed several cost items about which questions commonly are raised. Questions regarding costs not included in the listing below should be referred to the appropriate portfolio manager.

a) Equipment or supplies for volunteers on assignment are not allowable, unless these expenses are described in the Memorandum of Understanding with the volunteer station and there are
sufficient funds available to cover these expenses and meet all other requirements identified in
the Notice of Grant Award. [45 CFR 2551.46(f)]

b) The following insurance costs are not allowable:

1. Public liability insurance for sponsors (except for space that the AmeriCorps Seniors SCP
   sponsor occupies that is separate from the main sponsor offices).

2. Primary insurance for volunteers’ or project staff’s personal vehicles.

3. Health insurance for volunteers.

c) Costs for recruitment of personnel and volunteers for the award are allowable, including costs of recruiting
   hard-to-reach volunteers, such as those belonging to ethnic groups that may not be reachable by standard
   methods of recruitment.

d) Only compensation paid to staff who are engaged in activities that directly support the performance of the award is allowable. Sponsors should familiarize themselves with proper documentation requirements in accordance with the OMB Cost Principles (2 CFR § 200.430 “Compensation – personal services”).

e) When project staff are employed in the operation of two or more AmeriCorps Seniors projects, in
   order to be allowable, their salaries and fringe benefits must be budgeted on a prorated basis in
   each project’s budget, based on the allocation of time to each project. Grantees must document
   actual time spent on each grant, and only actual time should be reported.

f) The costs of National Service Criminal History Checks on AmeriCorps Seniors volunteers or
   prospective AmeriCorps Seniors volunteers are allowable. However, wherever possible, these
   costs should be paid by volunteer stations. When paid by the project, such costs should be
   budgeted as Volunteer Support Expenses because these costs are program operating expenses.

g) Costs of membership in the AmeriCorps Seniors or other professional associations are allowable.
   However, the membership must be attached to the organization (not an individual). An individual
   can be named on the membership but if the individual leaves, the membership stays with the
   organization. Additionally, federal/match funds may not be used for a membership to a lobbying
   organization. If the association/organization has a lobbying arm, grantees will need to ensure
   that their membership dues are not used for lobbying purposes. (2 CFR 200.454)

10.1.4 Direct and Indirect Costs

1) Definitions
Direct costs are costs that are readily associated with a particular budget line item. Indirect costs are
costs incurred by an organization that are not readily identifiable with a specific award, project, or
program, but are necessary to operate the organization and its programs. Indirect costs may also be
referred to as facilities and administrative (F&A) costs. Typical examples of indirect costs include
depreciation on buildings and equipment, the costs of operating and maintaining facilities, and

Terminology Note

In the electronic grants system, “grantee share” and “applicant share,” are used to refer to the required non-federal share of the grant.

“Local share,” as used in the program regulations, also refers to the required non-federal share.
general administration and expenses, such as the salaries and expenses of executive officers, administrative personnel, and accounting.

2) Cognizant Federal Agency
A “cognizant federal agency” is an agency appointed by the Office of Management and Budget that is responsible for negotiating and approving the indirect cost rates of a grantee on behalf of all federal agencies. Typically, the “cognizant” agency is the federal agency from which a grantee receives the majority of its federal support in the form of Direct Grants. When an organization that has no cognizant federal agency proposes indirect costs in a grant application, AmeriCorps may assume the role of providing oversight.

3) Process for Establishing an Indirect Cost Rate
When a grantee does not already have a federally negotiated indirect cost rate (sometimes called a negotiated indirect cost rate agreement, or NICRA), it may request one. The grantee may contact IndirectCostRate@cns.gov to initiate this process. The Indirect Cost Rate team will confirm AmeriCorps’s status as the cognizant agency for indirect costs and initiate the rate negotiation process.

4) De Minimis rate of Modified Total Direct Costs
Any non-Federal entity that has never received a negotiated indirect cost rate, except for those non-Federal entities described in 2 CFR Appendix VII to Part 200—States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b, may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. Please contact your grants official for more information.

10.2 ROLE OF THE AMERICORPS OFFICE OF GRANT ADMINISTRATION
The acceptance of an assistance award from AmeriCorps creates a legal duty on the part of the grantee to use the available funds or resources in accordance with the terms and conditions of the assistance agreement. An obligation exists on behalf of AmeriCorps to fund the grantee in accordance with the assistance award.

The Portfolio Manager for a given grant partners with AmeriCorps’s Grants Management staff based at the Office of Grant Administration (OGA). The Portfolio Manager is the representative of AmeriCorps Seniors in financial, budgetary, and administrative matters of AmeriCorps Seniors. The Portfolio Manager has overall responsibility for the receipt, approval and monitoring of all required financial documents from AmeriCorps grant Seniors programs. Only the Portfolio Manager, acting as the agent of the federal government, has the authority to:

- Award a grant.
- Modify the terms of a grant.
- Issue written instructions to the grantee to start or stop work.
- Execute any action which will result in increasing or decreasing the cost to the government.
- Extend or curtail the budget or project period cited in the applicable Notice of Grant Award (NGA).
- In conjunction with the OGA Director, or his/her designee, propose Management Decisions upon completion of an audit.
• Close-out a grant.

The Portfolio Manager is ultimately responsible for determining the allowability and reasonableness of grant costs proposed or incurred, except in certain circumstances related to the resolution of audit findings. The Portfolio Manager named in the NGA is the representative of the Grant Official for the purpose of monitoring the programmatic performance of the grant and advises OGA on all activities that may adversely affect performance. The OGA may accompany and work with the portfolio manager to conduct financial monitoring of the grant. However, grantees should first consult with the portfolio manager prior to seeking approvals where the OGA has the ultimate approval authority.

Grantees in states that are covered by new AmeriCorps Regional Offices, should contact their Portfolio Managers for financial, budgetary, and administrative matters.

10.3 BUDGET MANAGEMENT

10.3.1 Budget Categories

1) Costs are separated according to whether the proposed source of project support is federal or non-federal. In context of the budget, “federal” means “AmeriCorps Seniors,” and “non-federal” means “sources other than AmeriCorps Seniors” including certain other federal agencies, as authorized by law or by the source of funds.

a) “Required non-federal.” (Also known as “Grantee Share” on the budget). This is the part of the total non-federal budget used to meet the non-federal share requirement. Any additional amount that the grantee wants to include as part of the required non-federal share of the total project cost should also be under this category. Costs included under this category must meet all the cost requirements established by AmeriCorps Seniors. See the next page for more information on the required non-federal share of the budget.

b) “Excess non-federal.” This is the part of the total non-federal budget that is in excess of the non-federal share requirement. This is distinguished from the Excess Column on the budget. The two terms are not synonymous. The “Excess non-federal” is defined as funds over the required share budgeted in the “Grantee Share” column of the budget. Inclusion of excess non-federal costs is not required. If excess non-federal funds are budgeted, they must support the purpose of the project, consistent with the Domestic Volunteer Service Act of 1973. It is generally recommended that as long as costs are allowable, sponsors should budget those costs as part of the required non-federal share so they can be easily reported on the project’s Federal Financial Report.

2) Allowable costs separated by source are further differentiated by purpose, that is, whether the funds are to cover costs of Volunteer Expenses or Volunteer Support Expenses.

a) Section I. Volunteer Support Expenses: This section includes all allowable costs that are needed to administer (support) the volunteer project including the following line items:
   A. Project Personnel Expenses
   B. Personal Fringe Benefits
   C. Project Staff Travel
   D. Equipment
E. Supplies
F. Contractual and Consultant Services
I. Other Volunteer Support Costs
   a) Criminal History Background Checks
J. Indirect Costs

b) Section II. Volunteer Expenses: This section is a limited category which includes allowable expenses that directly benefit the volunteers:
A. Stipends
B. Other Volunteer Costs
   • Volunteer Travel
   • Meals
   • Insurance
   • Physical examinations
   • Recognition Items and Activities
   • AmeriCorps Seniors SCP Leader Monetary Incentive
   • Uniforms

10.3.2 Budget Criteria

1) The AmeriCorps Seniors SCP sponsor is expected to supplement the AmeriCorps Seniors grant with another budget support. The sponsor must raise the amount of non-federal support described in the project funding requirements located in AmeriCorps Seniors SCP Program Regulations 45 CFR 2551.92(e).

Terminology Note
In the context of AmeriCorps Seniors project budgeting, the term “Volunteer Expenses” is sometimes referred to as “cost reimbursements” or “Volunteer Benefits.”
2) An AmeriCorps Seniors grant may be awarded for up to 90 percent of the cost of development and operation of an AmeriCorps Senior Companion Program project. The sponsor is required to contribute at least 10 percent of the total project cost.

   a. Project support from non-AmeriCorps Seniors sources may be in cash or in-kind contributions.

   b. AmeriCorps Seniors-approved in-kind contributions may constitute part or all of the non-federal share requirement. Requirements for in-kind contributions are found in 2 CFR Chapter II Subpart D Section 200.306.

   c. AmeriCorps Seniors may allow exceptions to the non-Federal share requirement (at least 10 percent of the total project cost) in cases of demonstrated need such as:

      i. Initial difficulties in the development of local funding sources during the first three years of operations; or

      - Documentation that non-AmeriCorps funding requests were denied during the three year grant period. [Applicants will be able to submit letters or denial or other independent documentation that requests were not approved or are not likely to be approved]

      ii. An economic downturn, the occurrence of a natural disaster, or similar events in the service area that severely restrict or reduce sources of local funding support; or

      - Documentation that any of the above impacted applicants’ ability to secure non-AmeriCorps funds.

      iii. The unexpected discontinuation of local support from one or more sources that a project has relied on for a period of years.

      - Documentation that prior match providers will not provide match

3) A sponsor proposing to contribute less than the required non-Federal share must provide AmeriCorps Seniors with an acceptable written justification for the lower level of support. The justification is submitted through a link posted along with the respective notices of funding opportunity and application instructions. The justification for the waiver should:

   a. be requested prior to the grant award;

   Calculating the Required Non-Federal Share

   The required non-federal share for the AmeriCorps Seniors Senior Companion Program is 10% of the total project cost, excluding costs budgeted in the excess column.

   Use this formula to determine the required non-federal share for your award:

   \[
   \text{Required Non-Federal Share} = \left( \frac{\text{Federal Share}}{0.9} \right) - \text{Federal Share}
   \]

   For example, a sponsor that receives a federal share of $180,000 would calculate their required non-federal share like this:

   \[
   \text{Required Non-Federal Share} = \left( \frac{180,000}{0.9} \right) - 180,000 = 20,000
   \]
b. include supporting documentation;

c. include the grant period the waiver requested for (e.g. 1st year, 2nd year all years);

d. detail how much of the match needs to be waived (e.g. 5% or all of the match);

e. identify what activities on the grantee share would not happen if the waiver is granted.

4) All non-AmeriCorps funding expended for allowable costs will be counted as local support and as a contribution to the sponsor's local support with the following exceptions:

a. Non-Federal support already committed to meet non-Federal share requirements of any other Federally assisted project or program may not be budgeted as part of the non-Federal support for AmeriCorps Seniors SCP. [2 CFR Chapter II, Subpart D, Section 200.306]

b. Funds from federal agencies other than AmeriCorps, including federally funded in-kind resources, may not be budgeted as part of the sponsor's local support contribution, except those funds specifically authorized by law. [2 CFR Chapter II, Subpart D, Section 200.306]

i. There are hundreds of Federal grant programs, each governed by laws and specific regulations and administered by many different departments and agencies. AmeriCorps is not able to provide a list of federal grant programs where funds are authorized by law to be applied to the non-federal share of AmeriCorps Seniors grants.

ii. It is the **grantee's** responsibility to document that another Federal program’s funding is authorized by law to be used as non-federal share for other Federal grant programs.

iii. If you have questions concerning whether particular federal grant funds may be budgeted in the non-federal share, identify the source of the grant funds and contact the source of the funds for clarification. **Ask for the specific citation or document** that allows use of the funds in this way and maintain that documentation as part of the grant file for reference. A verbal confirmation is generally not sufficient.

c. Project costs for which the required non-federal funds are budgeted will be acceptable if:

a) costs are allowable; b) are reasonable in comparison to other costs; c) benefit the project's operational effectiveness; and d) contribute to achievement of AmeriCorps Seniors SCP program goals and objectives.

d. AmeriCorps Seniors grant awards are made for a specified dollar amount, and if the sponsor obligates or expends AmeriCorps Seniors funds for costs that exceed the amount of the AmeriCorps Seniors award, the costs are not allowable.

e. The number of individuals serving as AmeriCorps Seniors volunteers may vary from time to time to accomplish the number of budgeted volunteer service years.

f. Direct benefit items which are purchased at the volunteer’s own expense and not reimbursed, are not allowable as contributions to the non-federal share of the budget.
10.3.3 Budget Non-Compliance

10.3.3.1 Required Non-Federal Share

If a sponsor has failed to meet the statutorily required 10 percent non-federal share requirement, at the end of the project period the sponsor must take one of the two following actions:

a) Reimburse AmeriCorps Seniors the full amount of the deficiency, but only if so directed by the Portfolio Manager.

b) Submit a written request for a waiver to the appropriate portfolio manager. This written request must be submitted with the final Federal Financial Report (FFR) and must include:
   1. Why the requirement was not met.
   2. What specific attempts were made to achieve the required non-federal percentage?
   3. A plan to provide the required non-federal share in the current grant period, assuming the sponsor has started a new three-year project period.

10.3.3.2 Excess Resources

Sponsors are not penalized for failure to achieve the budgeted amount of excess support unless it affects the volunteer cost reimbursements ratio or volunteer service years (VSYs). Failure to meet the total budget, including the excess amount, will be examined in light of the overall effect on the project’s accomplishment of its goals and objectives.

10.3.4 Management of Volunteer Service Years (VSYs)

An AmeriCorps Seniors volunteer must serve a minimum of 260 hours annually, or a minimum of 5 hours per week, and may serve a maximum of 2080 hours annually, or a maximum of 40 hours per week. This requirement gives project directors considerable flexibility in establishing service schedules that meet volunteer and volunteer station needs. At the same time, it highlights the importance of carefully managing volunteers to meet the project’s budgeted VSYs.

10.3.4.1 Counting AmeriCorps Seniors Volunteers

There are three distinct ways of grouping volunteers for purposes of counting and tracking them for budgetary purposes:

A. Enrolled Volunteers

   This is the combined total of AmeriCorps Seniors volunteers on both active and inactive volunteer status. The total includes all the federally funded volunteers and non-federally funded volunteer needed to meet the budgeted VSYs. The enrolled total is the figure best used to estimate the number of recognitions that must be budgeted annually.

B. Active Volunteers

   This is the total of AmeriCorps Seniors volunteers actually serving or who served within the pay period when the count is made. It includes volunteers normally on active service but temporarily on paid leave. The annual average active total, less the average number of persons on leave, is the figure used to estimate the number of volunteer meals, transportation costs, and insurance costs to be budgeted annually.
C. Stipended Volunteers

This is the total of active AmeriCorps Seniors volunteers who will receive a stipend for services rendered during the pay period when the count is made. Volunteers who are normally active and stipended but who are temporarily on leave are counted as stipended. An annual average stipended total is used to estimate the amount of stipend funds to be budgeted annually.

10.3.4.2 Volunteer Service Year

1) AmeriCorps Seniors budget procedures use the following standards to express one full volunteer service year or VSY:
   a) 1,044 hours annually
   b) 261 days annually (at 4 hours per day)
   c) 52.2 weeks annually (at 20 hours per week)

2) The standardized stipend cost per VSY is calculated by multiplying the number of hours served by the current cost per hour for the stipend (1,044 hours x $3.00 per hour). Each VSY uses $3,132 in stipend funds each year.

3) One VSY does not always equal one volunteer. One VSY is equal to one volunteer only when that volunteer serves exactly 1,044 hours in one year, including leave time. To effectively manage VSYs, you will need to consider the number of hours each volunteer plans to serve weekly based on their set service schedule and project their annual stipend accrual. Over time, you will need to adjust your projections and reconcile them based on actual expenses. The VSY calculator provided in Appendix C.8 may help you manage VSYs and stipend expenditures throughout the year.

4) Volunteer hours should be reported on a cumulative basis in the Federal Financial Report (FFR) over the one-year budget year not the three-year project period. For example, Year 1 may yield 21,028 volunteer hours during the first FFR period, from January until June. From July until December, the second FFR period, 18,972 volunteer hours may be the total. The cumulative total over the Year 1 budget period would be 40,000 hours and that cumulative total is to be reported on the FFR. The beginning balances for Years 2 and 3 should be zero.

5) All of an individual's service time plus all stipended leave (as provided for in the sponsor's policies governing earned leave) cannot exceed, in the aggregate, 2088 hours annually. An individual AmeriCorps Seniors volunteer in SCP may serve up to 2088 hours, or two VSYs, in 12 months. Please review the C.14 AmeriCorps Seniors Guidance on Accrued Unused Leave for SCP & FGP Volunteers to ensure your policies reflect appropriate regulations.

10.3.4.3 Management of Stipend Funds

A sponsor agrees to generate a specific level of volunteer activity when a grant is awarded. This level of volunteer activity is calculated in terms of VSYs as described above and translated onto the budget to fund volunteer stipends.

Full expenditure of stipend funds available should be the goal of budget management. Sponsors submit an application with a plan to mobilize a targeted number of volunteers and reach a targeted number of beneficiaries. To achieve project goals, careful management of stipend expenditures, including leave, is key.
Sponsors should plan to recruit a sufficient number of volunteers to fully expend their budgeted stipends. Sponsors should not expect AmeriCorps Seniors to cover an over-expenditure of stipend funds. The VSY calculator provided in Appendix C.8 may help you manage VSYs and stipend expenditures throughout the year.

A. Factors Influencing Expenditure of Stipend Funds

Sponsors should strive to maintain a stable and consistent volunteer base. However, fluctuations in volunteer and recruitment numbers do occur. Sponsors should account and plan for the following in projecting their VSYs:

1) Volunteer attrition rates.
2) Extended leaves-of-absence.
3) Delays in orientation scheduling due to weather and resulting in placement delays.
4) Difficulties in recruiting eligible volunteers.

B. Suggestions for Management of Stipend Funds through Management of Stipended Hours.

Successful management of stipended hours and funds requires the development of quarterly or monthly projections that take into account sites that do not offer placements year-round, unstipended absences and attrition rates. (See Appendix C.8 for a VSY Calculator.)

1) Estimate Stipended and Unstipended Absences

Sponsors should estimate the effect volunteer absences will have on the actual total of hours stipended.

i. Stipended Absences

The sponsor's AmeriCorps Seniors SCP project policies relating to volunteer leave will be a guide for accurately estimating stipended absences. Reviewing volunteer service schedules and interviewing individual volunteers will support accurate estimates as to when AmeriCorps Seniors volunteers will take stipended leave. Please review the C.14 AmeriCorps Seniors Guidance on Accrued Unused Leave for SCP & FGP Volunteers to ensure your policies reflect appropriate regulations.

ii. Unstipended Absences

Predictable unpaid absences may occur for individual AmeriCorps Seniors volunteers when, for example:

a) There are school vacations for which the sponsor's leave policy allows no stipend for the AmeriCorps Seniors volunteers's time off; or

b) An individual AmeriCorps Seniors volunteer's serve an assignment at a less than 12 months per year facility (a variety of institutional and school assignments may fit this pattern).

c) Unpredictable unstipended absences may result, for example, from a volunteer's exceptionally lengthy illness or personal matters which require
emergency attention, which exceed the allowances in the sponsor’s leave policy.

2) Compare Planned Hours with Actual Hours

Stipend expenditures may be managed through careful monitoring of hours of service as follows:

Step #1

Determine the total number of hours of AmeriCorps Seniors volunteer service planned and budgeted. For example:

For a 60-VSY project, the stipend funds must be at most 60 multiplied by the current annual amount of the stipend, or $166,020.

Find the number of hours funded by multiplying 60 VSYs times 1,044 (hours) for a total of 62,640 hours.

Step #2

Determine the number of hours budgeted per pay period:

Divide the total hours by the number of stipend pay periods annually. The total pay periods will be either 26.1 or 52.2 annually.

If there are 52.2 pay periods, then the total hours (62,640 in this example) divided by 52.2 equals 1,200 hours for which funding is provided each week.

Step #3

Monitor the actual running total of service time plus stipended leave.

Whenever the weekly total of service time plus stipended leave is below the 1,200-weekly allotment of hours, the sponsor has an excess in hours available for paying stipends. Whenever the running total is above the weekly allotment, the sponsor creates a deficit in hours. Reviews conducted each pay period will enable projections to be made as to the rate of expenditure, and cumulative expenditures, in terms of hours.

3) Estimate Annual Reserve of Stipendable Hours

With estimates in hand for hours of stipended and unstipended leave, the sponsor will be able to estimate from the beginning of the budget year whether there will be a net excess in hours funded over actual hours to be stipended based on projections of volunteer service. A net excess may be considered a reserve which the sponsor should plan to draw upon immediately. Adjustments in enrollment to fully utilize the estimated reserve should be made as early as possible in the budget period because these adjustments become increasingly impractical as the budget period progresses.

It is possible, allowable, and encouraged to have more individuals actually serving and stipended at a given time than there are VSYs budgeted, so long as there is an estimated reserve of volunteer service hours available within budget.
10.3.5 Underachievement of Budgeted VSYs

Sometimes a sponsor may find that it is unable to deliver the budgeted level of VSYs approved as part of the grant award. Whatever the cause of the shortfall, the community served by the AmeriCorps Seniors SCP project is potentially deprived of services that could be provided by AmeriCorps Seniors SCP volunteers. Underachievement of VSYs also potentially deprives prospective volunteers of opportunities to serve. Further, the sponsor may be ineffectively executing its budget, and the resources dedicated to its grant may be more effectively utilized elsewhere.

10.3.5.1 Budgetary options to remedy underachievement of VSYs

Some options to remedy VSY underachievement are listed below. These options reflect budgetary actions that a sponsor or AmeriCorps Seniors may take to address VSY underachievement. The options do not detail programmatic strategies that may be exercised in concert with modifications to the budget. Sponsors should work with their Portfolio managers to develop and implement a full plan to address VSY under-expenditures as soon as a problem is identified.

If a sponsor wishes to take any of the budgetary actions presented below, the sponsor must send a request to their Portfolio managers that explains:

- The cause of the shortfall
- Your efforts to address the shortfall
- Your plan to rebudget
- Your plan to meet or modify the number of volunteers the project expects to mobilize and the number of beneficiaries the project will serve.

For every $6,500 in annual base federal funding they receive, grantees must continue to program at least one VSY in work plans that result in either National Performance Measure outcomes, or outputs related to the inclusion of individuals with disabilities (if they have historically supported such programming). This maximum cost per VSY is established in the Notice of Intent to Apply used when the grantee most recently renewed its three-year performance period. The sponsor must also comply with all other grant rules and regulations, match requirements, and performance measure requirements.

The budgetary options available include:

- **A. Temporary or Permanent Request to Rebudget**
  
  A sponsor may request to rebudget the grant award so funding can be reallocated to other expenses that can reasonably be expected to reduce or eliminate the VSY shortfall. In some cases, the request may include funding allocated to VSYs in the stipend line item. Typically, rebudget requests involve increased recruitment and recognition efforts.

  If a sponsor wishes to reduce the agreed-upon level of VSYs, it must request and receive written AmeriCorps Seniors approval to do so, in accordance with federal regulations at 45 CFR 2551.93(f). These regulations control anticipated expenditures of and place limitations on the movement of stipend funding. A sponsor may request to temporarily or permanently reduce the grant’s VSY level.

- **B. Temporary or Permanent Request to Return Grant Funding**
  
  A sponsor may request to temporarily or permanently return funding from the grant.

  A temporary return of grant funding is appropriate when, due to temporary and correctable circumstances, a sponsor anticipates falling short of its budgeted VSY level. A temporary return of grant funding allows a sponsor to request a reduction in funding for the current 12-month budget period.
Assuming the cause of the shortfall is remedied, the budget will revert to the grantee's base funding level in the next budget year.

A permanent return of grant funding is appropriate when a sponsor has determined that the maximum number of VSYs it can support will require the grant size to be reduced. This reduction may not result in a grantee programming less than one VSY in work plans that result in either National Performance Measure outcomes, or outputs related to the inclusion of individuals with disabilities (if they have historically supported such programming) for every $6,500 in annual base federal funding they receive.

C. AmeriCorps-Initiated Reduction of Funding
AmeriCorps Seniors monitors the VSY levels associated with each grant award using the FFR. When a sponsor does not achieve the minimum VSY level allowed on the grant, portfolio managers must notify a sponsor of its underachievement and engage the sponsor in taking prompt corrective action. When a sponsor continues to underachieve VSY levels, AmeriCorps portfolio managers must take action that may ultimately result in a permanent reduction of funding on the grant.

The minimum VSY achievement level for most grants is:

- 37% of the annually budgeted VSYs at the semi-annual reporting period.
- 97% of the annually budgeted VSYs at the annual reporting period.

Grants with 24 or fewer VSYs and grants in their first three-year performance period are not subject to these specific minimums. Grantees at risk of VSY underperformance in these circumstances should contact their portfolio managers to develop a case-specific plan. These plans may utilize the same budgetary and non-budgetary remedies described here.

The State Office will send the sponsor a notification of VSY underproduction letter that states what the problem is and offer choices for resolution according to the length of time the grant has not achieved the minimum VSY level. The portfolio manager will also work with the sponsor on developing or updating a corrective action plan.

If a sponsor continues to be unable to produce the number of agreed upon VSYs, AmeriCorps Seniors may take action that results in a reduction in VSY level. AmeriCorps Seniors may also take action that involves a reduction in the federal grant award.

10.4 GRANT AMENDMENTS AND REBUDGETING
During implementation of a grant, a grantee may decide to make adjustments to the approved application. All grant amendments and budget changes should be made and documented into the system of record, but the following changes require prior AmeriCorps Seniors approval and amendment of the NGA:

- A change in the scope of service or a substantial change in goals or objectives.
- A change in key personnel specified in the application or federal award.
- A request for a project director at less than full time.
- The creation of a new budget line item where there will be a need for additional funds.
- The transfer of funds budgeted for direct costs to indirect costs.
- The request of a match waiver.
- Extension or reduction of the budget or performance budget period.
If the federal share of a grant is greater than the Simplified Acquisition Threshold amount of $250,000 and the grantee’s cumulative changes exceed 10% of the total budget, the grantee must request prior approval to submit an amendment. AmeriCorps, as the federal awarding agency, cannot permit a transfer that would cause any federal appropriation to be used for purposes other than those consistent with the appropriation. [2 CFR Chapter II, Subpart D, Section 200.308] Grantees should consult with your portfolio managers regarding budget changes, even if pre-approval is not required.

10.5 ACCESSING GRANT FUNDS AND MANAGING ADVANCES

All AmeriCorps Seniors grantees are paid through the Department of Health and Human Services (HHS) Payment Management Services, abbreviated as PMS. AmeriCorps Seniors grantees must establish an account with the HHS/PMS that allows them to draw down funds. When a grant is awarded in the electronic grants system, the grant is recorded in AmeriCorps’s accounting system and transmitted to PMS which maintains an account for each grant. Grantees draw funds from that account.

10.5.1 Steps in Setting up a PMS account

1) Grantees without a PMS account should contact the appropriate Portfolio Manager. The Portfolio Manager will send the grantee instructions informing the grantee that it needs to fill out an 1199A Direct Deposit Form, which records the agreement of the grantee and its financial institution. The grantee designates the bank that will receive funds for the grantee. Also enclosed in the instruction letter are the other forms and documents the grantee needs to complete and establish their account.

2) The grantee forwards the completed forms to the appropriate offices as outlined in the instructions.

3) HHS notifies the AmeriCorps of the grantee's assigned suffix and PIN through e-mail, and simultaneously, sends a certified letter to the grantee with the same information.

10.5.2 How grantees request funds through PMS SMARTLINK

Grantees use SMARTLINK to access funds. SMARTLINK is an automated “next day” direct deposit system for the Federal government. Recipients assigned to SMARTLINK use a PC to access the PMS SMARTLINK Request For Funds application, enter their account and drawdown information (e.g. account number and amount requested), and receive a status message detailing their transaction. The transaction is completed online, and funds are direct deposited into the recipient’s account on the next business day.

Funds should only be drawn down for immediate cash needs or on a reimbursement basis. Grantees should develop written policies and procedures for drawdowns so that they are done on a consistent basis and a clear audit trail exists. 2 CFR Chapter II, Subpart D, Section 200.305

At any time, Portfolios Manager can log on to the PMS directly or view authorized, disbursed, and advanced amounts in the electronic grants system.

Grantees may:

- Draw down funds on a reimbursement basis;
- Draw down funds that they will be using in the immediate future, usually considered to be within three days of receipt; or
• Maintain advance payment of federal funds in interest bearing accounts unless the following apply: (See “Interest Earned on Advances” below.)
  a. The grantee receives less than $120,000 in Federal awards annually.
  b. The account would not earn interest in excess of $500 per year.
  c. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
  d. A banking system prohibits or precludes interest bearing accounts.
• Interest earned amounts up to $500 per year may be retained by the non-Federal entity for administrative expense. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment.

Please review the help and training for grantees using the PMS.

10.5.3 Federal Cash Transactions Report – PSC 272 A
Grantees report on funds by submitting quarterly Federal Cash Transaction Reports (PSC 272 A Report) directly to PMS. The PSC 272 A Report is an overview of the cash status of the account. It contains data provided by PMS to the recipient and the net disbursement amount as calculated by the recipient. The PSC 272 A Report is similar to a checking reconciliation and is used to report the amount of “Cash on Hand.” HHS monitors this amount and deducts any cash on hand amount from previous payment requests. At the end of the grant performance period, the SF 425 Federal Financial Report MUST reconcile with the PSC 272 A Report and the amount drawn down. If these three numbers are not identical, the grant cannot be closed.

10.5.4 Interest Earned on Advances
Grantees are required to maintain advances of federal funds not used within 3 days in an interest-bearing account. The project will be allowed to retain the first $500.00 of interest per year to cover administrative expenses. Interest earned above this amount must be remitted annually in a check made payable to the U.S. Treasury, to the Department of Health and Human Services, Division of Payment Management, P.O. Box 6021, Rockville, MD 20852.

The Cash Management Improvement Act and regulations that established this requirement have some exceptions. The major ones that can impact an AmeriCorps Seniors grantee are as follows:

➢ State government grantees do not have to follow this requirement unless required to do so by the Department of Treasury Financial Management Service.
➢ Indian Tribal Governments are also exempt from this requirement.
➢ The recipient receives less than $120,000.00 per year from all federal sources.
➢ The best reasonable available interest-bearing account would not have been expected to earn in excess of $250.00 per year on the federal balance.

10.6 SUSPENSION, TERMINATION, AND DENIAL OF REFUNDING
The rules on grant suspension, termination, and denial of refunding procedures are addressed in the AmeriCorps Seniors SCP Program Regulations (45 CFR 2551.34).
10.7 AUDIT REQUIREMENTS

10.7.1 Single Audit
Recipients of federal grant awards are required to have audits performed in accordance with the Single Audit Act Amendments of 1996 (Single Audit Act), as amended. OMB Budget Guidance Audit Requirements, provides guidance on audit requirements pursuant to the Single Audit Act. The Audit Requirements established that grant recipients that expend $750,000 or more of federal funds in a year must have an independent auditor perform a single audit, or a program-specific audit. These audit requirements do not apply to organizations expending less than $750,000 in total federal funds in a given year.

When applicable, a single audit requires the sponsor to have an audit of its entire organization conducted by an independent auditor that essentially determines:

- If the organization's financial statements present its and the program's financial position fairly;
- If the institution has the internal control structure to ensure that the program is managing the award in accordance with the applicable federal laws and regulations; and
- That the program has complied with the applicable laws and regulations that may have a direct and material effect on the program's financial statement.

10.7.2 Other Audits
In the case of sponsors whose total federal funding falls below the $750,000 threshold established by the requirements of OMB Post Federal Award Requirements (2 CFR Chapter II, Part 200, Subpart D), the sponsor’s policies apply. Sponsors are expected to follow generally accepted accounting practices. Sponsors directed by AmeriCorps to conduct an audit must provide copies of any audit report partially or wholly charged to the grant to the AmeriCorps Portfolio Manager. Grantees need to follow applicable federal, state and local requirements for financial reporting and audits for their type of organization.

Federal Audit Clearinghouse:

Audits performed under the Single Audit Act are to be sent electronically to the Federal Audit Clearinghouse. The Internet Data Entry System (IDES) is the place to submit the single audit reporting package, including form SF-SAC, to the Federal Audit Clearinghouse (FAC). Single audit submission is required under the Single Audit Act and 2 CFR § 200.512.

10.8 CONCLUSION
Familiarize all staff with AmeriCorps Seniors SCP Program Regulations, 2 CFR Chapters I and II, specifically OMB Cost Principles and OMB Guidance for Grants and Agreements, to ensure compliance. Keep good documentation that demonstrates that costs are reasonable, necessary, allocable, allowable, and adhere to grant guidelines. Ensure that there is a clear audit trail for all financial reports from accounting system to data submitted. If you have a question, contact your AmeriCorps Portfolio Manager.

10.9 EFFECTIVE PRACTICES FOR SECURING NON-AMERICORPS FINANCIAL AND IN-KIND SUPPORT
The sponsor:

A. Secures cash or in-kind contributions, amounts that regularly exceed the required non-AmeriCorps support for the project;
B. Develops and maintains a diversified non-Federal funding base from the private sector, the nonprofit community, and state and local government;

C. Has a commitment to secure non-AmeriCorps support for the project which is incorporated into the sponsor’s resource development plan;

D. Includes the project as a designated department in annual giving campaigns such as United Way;

E. Demonstrates the project’s role as an extension of its core services by directing opportunities, such as grants, specifically to the project;

F. Has an established long-range resource development and mobilization program that includes the project as a key program to be supported;

G. Designates a sponsor staff member to help generate the needed support;

H. Actively engages its Board in developing non-Federal resources for the project;

I. Works collaboratively with the project’s entity for community participation as dual leaders in mobilizing resources for the project;

J. Keeps project staff informed of the financial status of the project;

K. Makes consistent progress toward expansion of the AmeriCorps Seniors SCP project with other funds;

L. Learns from other sponsor’s models for building successful partnerships and ways of addressing AmeriCorps Seniors-specific resource development and mobilization challenges;
11 Tips to Help Avoid Common Audit Findings

Audit findings frequently result from missing, incomplete, or insufficient documentation that grant requirements have been met. Following are 11 steps to help avoid the more common audit findings:

1. Make sure current Memorandums of Understanding are on file for all volunteer stations where volunteers are serving (45 CFR 2551.23(2)).

2. Maintain documentation on file, updated annually, that shows that all enrolled volunteers meet the eligibility requirements (Age, Income, NSCHC, etc.) (45 CFR 2551.41 and 45 CFR 2551.42).

3. Ensure there are written assignment descriptions on file for all volunteers (45 CFR 2551.72).

4. Document the eligibility of beneficiaries of volunteer services, preferably in the assignment plan, and maintain these in the volunteer files (45 CFR 2551.81).

5. Retain supporting source documentation for all volunteer local travel reimbursements (45 CFR 2551.46(c)).

6. Ensure all grant funded staff have complete national service criminal history check documentation (45 CFR 2551(j)) and appropriate time tracking documentation kept on file. Time tracking documents should clearly show that any time spent on non-grant or unallowable activities, such as fund raising or working on other sponsor projects, has been appropriately allocated to other sponsor accounts.

7. Ensure your organization’s written policies and your implementation procedures for National Service Criminal History Checks are in compliance with the requirement (45 CFR 2551(j)). See Chapter 5 and the NSCHC webpage carefully to be sure your written policies and your implementation procedures are in compliance.

8. Ensure that there is clear documentation of how volunteer service hours (45 CFR 2551.51) and other cost reimbursements were tracked (45 CFR 2551.46) and these records are on file.

9. Document receipt and valuation of all in-kind contributions counted toward the required non-Federal share of the grant.

10. Submit all required reports, such as the Federal Financial Reports, Project Progress Reports and make sure they are on time.

11. Document your organization’s policies and procedures, including internal financial controls, in a manual or handbook.
11 REPORTS AND RECORDKEEPING

Reporting and recordkeeping are essential functions of project management to ensure proper stewardship of public funds and provide information needed to report to the Congress and Executive Branch of the Federal Government on expenditures, project progress, and accomplishments. General reporting and recordkeeping requirements are discussed in this chapter, but projects should always consult their specific Notice of Grant Award (NGA) Terms and Conditions for the specific requirements of their grant.

11.1 REPORTS

Every recipient of a federal grant is expected to submit reports on the expenditure of all funds identified within the Notice of Grant Award (NGA). The NGA contains standard Terms and Conditions that apply to all grantees, as well as special conditions, as applicable, to a specific grantee. You can print a copy of your NGA from the electronic grants system. Terms and Conditions are available online. For reporting related to federal grant funds drawn down by the grantee, see Chapter 10.

Financial reports provide information to Portfolio Managers about the total dollars expended. Progress Reports provide information about the service the volunteers are performing with respect to the project plan in the approved grant application. See Appendix A.5 for report due dates.

11.1.1 Financial Reports

1) Federal Financial Report (FFR), Standard Form (SF) 425

The Federal Financial Report (FFR) is typically due on a semi-annual basis for each grant as specified in the Terms and Conditions referred to in your NGA. AmeriCorps Seniors grantees submit FFRs in the AmeriCorps grants management system. The FFR is used to report the following transactions: Federal Cash, Federal Expenditures and Unobligated Balance, Recipient Share, and Program Income.

Typically, the Terms and Conditions issued with the NGA by AmeriCorps for AmeriCorps Seniors contain the following conditions regarding Federal Financial Reports:

a) Grantees report expenditures semi-annually from the start date of the grant on the FFR, OMB Form SF-425, by submitting an electronically signed form in the AmeriCorps grants management system within 30 days of the end of each reporting period, as specified in the Terms and Conditions of the NGA.

b) FFRs describe expenses on a cumulative basis over the performance period of the grant (3 years).

c) Projects completing the final year of their grant must submit a final FFR that is cumulative over the entire grant period. This FFR is due 90 days after the close of the grant.
2) Federal Cash Transaction Report, Standard Form 272 (SF 272)

Grantees report on funds by submitting quarterly Federal Cash Transaction Reports (PSC 272 A Report) directly to PMS. The PSC 272 A Report is an overview of the cash status of the account. It contains data provided by PMS to the recipient and the net disbursement amount as calculated by the recipient. The PSC 272 A Report is similar to a checking reconciliation. At the end of the grant performance period, the SF 425 Federal Financial Report MUST reconcile with the PSC 272 A Report and the amount drawn down. If these three numbers are not identical, the grant cannot be closed. Payment Management Services provides answers to Frequently Asked Questions concerning the Payment Management System (see Chapter 10 for How to request funds through PMS SMARTLINK).

References and Reminders

- Keep the portfolio managers apprised of any questions, concerns, issues, or developments related to the grant.
- Use these source documents to review specific requirements and procedures for financial reporting:
  - Notice of Grant Award (NGA) including Terms and Conditions, and any special conditions
  - AmeriCorps Seniors SCP Federal Regulations [45 CFR 2551]
  - Refer to the Resource section of the FGP Grantee page, select action, Submit A Federal Financial Report (FFR) for help with the FFR.
- Funds returned to AmeriCorps Seniors at the close out of the grant relationship with AmeriCorps Seniors or for disallowance of grant costs are to be forwarded to AmeriCorps’s collection officer in the OGA, but only as directed by the portfolio manager. (See Appendix A.3: Guidance for Closing Out Your AmeriCorps Grant)
- Delays in submitting FFRs may cause advance or reimbursement requests to be delayed until the overdue FFR is received.

11.1.2 Progress Reports

1) Project Progress Report Annual and Semiannual

The Progress Report Annual and Project Progress Semiannual are used to ensure AmeriCorps Seniors SCP grantees address and fulfill legislated program purposes; meet agency program management and grant requirements; track and measure progress to benefit the local project and its contributions to volunteers and the community.

Projects report progress toward meeting the objectives of the project plan which consists of the series of work plans agreed upon in the awarded grant. In addition to project plan reports, narratives in the Progress Report Annual are used to report challenges encountered, partnerships developed, non-federal fund development, volunteer stories, and other accomplishments.

Progress reports are prepared and submitted in the AmeriCorps electronic grants management system after the first six months and at the end of the budget year, unless noted otherwise on the
NGA or in the Terms and Conditions for your grant. The due date is no later than 30 days after the end of the reporting period. (See the AmeriCorps Seniors SCP grantees page for the Progress Report Instruction and Appendix A.4 for Progress Report Tips.)

2) Progress Report Supplement

The Progress Report Supplement (PRS) is the annual data collection conducted by AmeriCorps to aggregate the latest numbers and accomplishments of AmeriCorps Seniors grantees.

The sponsor completes the PRS in the AmeriCorps electronic grants management system in the first quarter of the federal fiscal year (October – December). The report asks the project to provide a statistical profile of the AmeriCorps Seniors SCP volunteers serving during the 12-month reporting period, including volunteer demographics and project activities.

3) Note: Late submission of financial or progress reports may result in the AmeriCorps Seniors placing a temporary hold on grant funds. A temporary hold is implemented if the report is not received by AmeriCorps Seniors within 45 calendar days after the established due date. An established due date includes an extended due date, when applicable.

11.2 RECORDKEEPING

As required by 45 CFR 2551.25(g), the sponsor must develop recordkeeping and reporting systems in compliance with AmeriCorps Seniors requirements that ensure quality of program and fiscal operations and facilitate timely and accurate submission of required reports. The sponsor’s records also document compliance with regulatory programmatic and fiscal requirements and must be available to AmeriCorps staff to review on compliance monitoring site visits or in case of audit.

Records, including timesheets and requests for cost reimbursements, may be stored either digitally or in hard copy, given all other necessary conditions for the document in question are met. Necessary conditions include but aren’t limited to review and approval by appropriate signatories, records retention requirements, and security requirements.

When signatures are required, an electronic version is permissible when appropriate safeguards are in place to ensure that the signature can only be provided by the person in question. An example of this is an online tracking system where individuals have unique login credentials. Adobe Acrobat forms also have functionalities that allow for unique digital signatures.

Records may be subject to state law or local ordinance governing access to records.

11.2.1 Sponsor Records on Volunteer Stations

The project maintains a file on each volunteer station containing:

1. A current, signed Memorandum of Understanding. (See Chapter 6 for more information about the MOU)
2. Letters of Agreement, where there are in-home assignments through the volunteer station.
3. A listing by name of the AmeriCorps Seniors volunteers placed at the volunteer station.
Maintaining Complete Volunteer Files

Maintaining complete volunteer files for the length of time required by law is critical for a sponsor to remain in compliance with federal recordkeeping requirements. See Appendix C.9 for a checklist of everything that you need to maintain in a volunteer file. Among the most important components are the ones that you must complete annually to establish and maintain volunteer eligibility, such as documenting income eligibility. You must maintain copies of these key documents for each year a volunteer serves. For example, if a volunteer has served for the past eight years, you should have eight income eligibility reviews in their file.

When can you dispose of these records? With some exceptions, federal recordkeeping requirements require grantees to retain all documents associated with a grant – including volunteer files – for three (3) years from the date you submit the final FFR for the relevant project period (2 CFR 200.333). For volunteers, this means that you should maintain files for at least three years after the FFR associated with the three-year project period when the volunteer leaves service.

For example, suppose Tania begins volunteering with your program in 2010 and continues volunteering until 2016, when she exits your program. Your grant performance period runs from July 1, 2015, through June 30, 2018. You submit your final FFR for that performance period 90 days after the end date of June 30, 2018, which is September 30, 2018. You can dispose of Tania’s files three years after that – September 30, 2021, or after. This means that as late as September 29, 2021, you should still be able to access all of Tania’s files – including her first income eligibility review.
11.2.2 Sponsor Records on Individual AmeriCorps Seniors Volunteers

The project should maintain records for each volunteer containing:

1. An enrollment form signed and dated by the volunteer, including name, address, telephone number and date of birth.
2. A signed Designation of Beneficiary (for insurance purposes).
3. The name of the volunteer station(s) where the AmeriCorps Seniors volunteer is placed.
4. A copy of the written assignment description for each volunteer or a notation that the volunteer’s assignment description is maintained at the volunteer station.
5. The AmeriCorps Seniors volunteers service schedule and verification of actual hours served.
6. A copy of the current written volunteer assignment plan.
7. Documentation of a physical examination if applicable to your project.
8. An income eligibility review for each year a volunteer participates as an AmeriCorps Seniors volunteer, including the volunteer’s initial income eligibility review from their enrollment, an income eligibility review that has been completed within the past 12 months, and all such annual reviews in between as applicable.
10. Sponsor are required to have documentation verifying that the required National Service Criminal History checks (NSCHC) were conducted, the results were evaluated, and the sponsor’s NSCHC policy is on file and available for AmeriCorps Seniors compliance monitoring and for other audit purposes. Confidential files should be secured to protect identity. **Grantees that do not have documentation to show compliance with the NSCHC requirements may be subject to cost disallowance.** Please read the [NSCHC webpage](#) carefully to be sure your policies and your implementation procedures are in compliance with the requirement.

See the box on the prior page on maintaining complete volunteer files for more information.

(See Appendix C.9 for a sample volunteer files check list.)

11.2.3 Personally Identifiable Information

All volunteer records are confidential and must be kept in secured files to protect all personally identifiable information (PII). Personal information about volunteers contained on the enrollment form, such as home address, should be disclosed only with the expressed prior written permission of the volunteer.

When you create, collect, use, process, store, maintain, disseminate, disclose, or dispose of PII related to your grant award, you must have policies and procedures in place to manage this information and to guide your response in the event of a breach. You are required to promptly notify individuals who are affected or potentially affected by a breach. You must also promptly notify AmeriCorps Seniors of any such breaches. The resources below may help you develop or strengthen your policy or procedures related to responding to a breach.
11.2.4 What Is a Breach?
A breach is the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, or any similar occurrence where (1) a person other than an authorized user accesses or potentially accesses personally identifiable information or (2) an authorized user accesses or potentially accesses personally identifiable information for another than authorized purpose. Your response to a breach must include notifying AmeriCorps Seniors of the breach.

11.2.5 Responding to a Breach
You should establish a policy and procedures that:
1. Explain when and how you will promptly notify potentially affected individuals.
2. Outline when and how you will promptly notify AmeriCorps Seniors. You may want to incorporate a breach reporting form similar to the form located here.
3. Satisfy any additional requirements like those issued by state law or those specific to your organization. Resources, like the National Conference of State Legislatures Security Breach Notifications Laws list, may help you identify the privacy notification laws for your state.

The U.S. Department of Education’s Privacy Technical Assistance Center also maintains an online toolkit that provides a body of resources and best practices on this subject that you can customize for your needs.

11.2.6 Data Collection and Retention (including Financial Data)
1) Periodic Data Collection: Accuracy and timeliness of reports are facilitated by collecting and recording data needed on a regular basis using consistent procedures and tools.
2) Keep records of how data was collected: Data reported must be verifiable.
3) Retain Records: Data collected, including financial records, must be retained for at least three years from the date the grantee submits the final FFR for the project period or three years past the last audit, whichever is most recent. As volunteer service often extends across multiple grant years, volunteer records must be maintained for at least three years from the date the grantee submits the final FFR for the three-year grant cycle in which the volunteer exited service or three years past the last audit, whichever is later. This is also discussed in more depth in the box on page 92.
4) Volunteer Timesheets: Sponsors are required to ensure that timesheets or electronic time and attendance records are maintained that display the actual hours served by each volunteer. To create a system of internal controls, the timesheets or electronic time and attendance records should be signed or validated by the individual volunteer and the responsible volunteer station supervisor. The project supervisor or director may also sign or validate the timesheets or electronic time and attendance records.
5) Salary and Wage Documentation: Following is a summary of the requirements for documenting project staff time and attendance from the 2 CFR 200 Grants and Agreements.
   a. Be supported by a system of internal controls and incorporated into the official records of the organization.
b. Reflect an after-the-fact distribution of the employee’s actual work activity for each pay period.

c. Reflect the total activity of each employee paid from the grant.

d. Comply with the established accounting policies and practices of the organization.

e. Be signed by the employee or supervisor having firsthand knowledge and certified by an authorized sponsor official.

6) National Service Criminal History Checks (NSCHC) for staff: The NSCHC is a screening procedure established by law to protect the beneficiaries of national service. For AmeriCorps Seniors SCP, the requirements apply to anyone receiving any part of their salary from the AmeriCorps Seniors SCP grant funds (federal or non-federal share) and all AmeriCorps Seniors volunteers. Sponsors are required to have documentation verifying that the required checks were made, the results were evaluated, and the sponsor NSCHC policy is on file and available for AmeriCorps compliance monitoring and for other audit purposes. Confidential files should be secured to protect identity. Grantees that do not comply with the NSCHC requirements may be subject to cost disallowance. Please read the NSCHC webpage carefully to be sure your policies and your implementation procedures are in compliance with the requirement.

7) In-Kind Contributions: Documentation for in-kind contributions must record donation and valuation of each item. The value of In-kind contributions should be entered into the general ledger and the Federal Financial Report submitted to AmeriCorps Seniors.

   a. To be acceptable as non-federal share (match) all cash and/or in-kind donations must meet the Cost Principles requirement that the cost (donation) must be allowable, reasonable, necessary, and allocable for the performance of the grant award.

   b. To value an in-kind contribution, fair market value is the standard. Fair market value (FMV) is the price that property would sell for on the open market. It is the price that would be agreed on between a willing buyer and a willing seller, with neither being required to act, and both having reasonable knowledge of the relevant facts. If a donor puts a restriction on the use of donated property, the recipient of the donation must honor that restriction. Finally, the in-kind voucher form signed by the donor should be reviewed to ensure the value is reasonable and comparable with other estimates or bases for value.

   c. The in-kind voucher justifies the valuation of personal services, material equipment, building, and other non-cash donations. The voucher should include: the name and signature of the donor, the date, the location of the donation, a description of the item/service donated, and the estimated value of the donation. Grantees should acknowledge the contribution with a receipt that includes the name of donor, date and location of donation, a description of item/service, and the estimated value. A copy of the receipt should be kept in sponsor’s files. For more information see Appendix A.14: Sample In-Kind Contribution Form and Tutorial: Valuing, Documenting, and Recording In-Kind Match.
8) Reimbursement Claims: Documentation for all Volunteer Expenses related to transportation, meals, and/or other costs claimed during the period of volunteer service must for compliance monitoring or audit purposes:

a. Contain the volunteer’s name, number or other identifying information used by the project.

b. Specify the type of expense reimbursement such as mileage or meals.

c. Specify the amount to be reimbursed.

d. State the reason for reimbursement.

e. Include documentation of the expense required by the sponsor.

f. Specify the date the expense was incurred.

g. Provide a way for the volunteer to certify that the expense was incurred during service hours.

9) Projects that use timesheets may incorporate volunteer expense claims on the timesheet form. Costs must be verified by signatures of the volunteer, the volunteer station supervisor, and designated AmeriCorps Seniors SCP staff. (See Appendix C.3 for a sample timesheet that incorporates hours of service, and mileage expenses.)

10) Using AmeriCorps Seniors SCP volunteers for Data Collection/Recordkeeping: AmeriCorps Seniors volunteers can be assigned by project directors to various tasks that involve data collection and recordkeeping (For more information regarding AmeriCorps Seniors SCP sponsors as volunteer station see Chapter 6)

11.2.7 Counting and Reporting AmeriCorps Seniors Volunteers, Performance Measures, and Other Metrics

AmeriCorps Seniors SCP projects are responsible for having a system that allows them to track all required data accurately and in sufficient detail to meet the requirements of the progress reports, including the Progress Report Supplement

1) Reporting requirements for the Progress Reports and the Progress Report Supplement are found in the NGA or the Terms and Conditions for your grant.

2) The reported number of volunteers serving, and hours served should be approximately equal to or greater than the numbers projected in the budget. AmeriCorps Seniors will monitor and verify numbers reported.

3) See “Criteria for an Effective AmeriCorps Seniors volunteer in SCP Service Tracking System” in the following box.

Reminder
Travel to and from home to the volunteer assignment, and mealtimes that are not part of the assignment description, are not to be included in hours of service.
Criteria for an Effective AmeriCorps Seniors Volunteer Service Tracking System

1. The system is documented in written sponsor policies as the standard used by the AmeriCorps Seniors SCP project and:
   (a) Defines and describes the system
   (b) Identifies tools to be used
   (c) Identifies allowable persons and authentication method such as hard copy signature or e-mail
   (d) Specified location of official records
   (e) Requires storage and retrieval of records – hard copy or electronically

2. The system's reporting tools, such as the following, are consistent with sponsor policy:
   (a) Hard copy time sheet
   (b) Hard copy group sign in sheet
   (c) E-mails relating to a volunteer’s hours are sent by an appropriate, authorized person – e.g., the volunteer’s supervisor or the volunteer.
   (d) Electronic group sign-in sheet
   (e) Telephone report by volunteer supervisor or volunteer with written confirmation consistent with the sponsor policy
   (f) Fax or Scan
   (g) Web-based system

3. The system provides assurances that the person reporting the hours is authorized to do so – such as the volunteer or the volunteer station supervisor.

4. If hours are submitted via e-mail by the SCP volunteer or the volunteer station supervisor:
   (a) Sender uses an e-mail system that requires a recognizable sign-in name that is registered with the sponsor/project as the volunteer.
   (b) The e-mail is addressed to the person identified by the AmeriCorps Seniors SCP/sponsor policies as having the authority to accept and view e-mails reporting hours.
   (c) The system used by the e-mail recipient (i.e. AmeriCorps Seniors SCP Project Director) is capable of storing and retrieving the e-mails reporting AmeriCorps Seniors volunteer hours.
11.3 PROJECT COMPLIANCE MONITORING

AmeriCorps is required to monitor awardees. Limited resources require the Office of Monitoring (OM) to direct monitoring resources to areas that pose specific risks to the agency. AmeriCorps uses a data-driven, internal risk assessment module which categorizes grants by a level of risk, and groups these risk and performance indicators into the following categories: financial, programmatic, organizational, and compliance. This risk model informs OM of the type of issue-specific monitoring activities that should be assigned to grants.

AmeriCorps’s monitoring framework consists of issue-based monitoring activities that link AmeriCorps Seniors objectives with the monitoring process. Monitoring of AmeriCorps Seniors awardees supports AmeriCorps’ ability to:

- Test compliance with AmeriCorps Seniors legal, regulatory and policy requirements
- Identify and minimize potential risks to AmeriCorps and AmeriCorps Seniors
- Identify specific technical assistance needs
- Provide guidance and technical assistance
- Analyze recurring problems

Monitoring activities:

- Vary in length, scope, and intensity;
- Can be conducted via various methods, such as on-site at grant recipient locations or remotely from AmeriCorps headquarters
- Can include a combination of one or more issue-based monitoring activities from the OM Uniform Monitoring Package (UMP), or monitoring toolkit
- Can be initiated when a level of risk, along with other programmatic and/or fiscal indicators, warrant such an intervention
- Can be assigned randomly to grants with low or medium levels of risk, as a method of validating the grant portfolio risk assessment module and monitoring selection methodology.

Monitoring activities and outcomes can help to forge working relationships with recipients and partners, and to facilitate conversations about program successes, innovations, and challenges.

11.3.1 MONITORING ACTIVITY TYPES

OM uses a Uniform Monitoring Package (UMP) which consists of five issue-based compliance assessments. The UMP can be applied wholly to a grant award or separated to apply one or more of the issue-based compliance assessments, as determined by a grant’s risk assessment results. The issue-based monitoring activity types are as follows:

- AmeriCorps Program-Specific Compliance: Document review and interviews of a sample of members/volunteers, their supervisors, and grantee staff to assess compliance specific to the grant program (AmeriCorps or AmeriCorps Seniors).
- Financial and Operational Fitness Assessment (FOFA): Document review, including grantee application submission of Operational and Financial Management Survey (OFMS), if applicable, and cost-testing to assess compliance with key regulations of 2 CFR 200, Uniform Administrative Guidance, including timekeeping practices.
• National Service Criminal History Check (NSCHC): Review of NSCHC records for entities required to comply with 45 CFR §§ 2540.200-207. NSCHC grant records are sampled in accordance with the NSCHC Guide to Enforcement Action.
• Subrecipient Monitoring Oversight: Document review to assess a prime grantee’s compliance with 2 CFR § 200.331, Requirements for pass-through entities.
• Prohibited Activities: Interviews of a sample of members/volunteers, their supervisors, and grantee staff to assess compliance with 45 CFR § 2540.100 and other regulations addressing AmeriCorps prohibited activities for individual grant programs.

Prior to conducting monitoring assessments, AmeriCorps monitoring officials will notify awardees of their selection for one or more monitoring activities. These notifications consist of email communications with a letter from the Office of Monitoring and will describe the type of monitoring activity to be conducted, the timeframe for responding to requests for information, and instructions for providing secure file transfers, if applicable to the monitoring activity type. Notifications are addressed to the awardee’s Authorized Representative with a courtesy copy to the Program Director and the AmeriCorps Portfolio Manager. Timeframes for each phase of the monitoring activities vary across projects. OM will make continued efforts to keep awardees informed of the status of monitoring activities, including when to expect monitoring results.

If an awardee is selected for an on-site monitoring visit, AmeriCorps monitoring officials will provide at least 30-days’ notice of the planned visit and will provide details about the type of documentation to be made available, as well as coordinating interviews with staff and/or volunteers. The following image depicts the AmeriCorps monitoring activity lifecycle:

All monitoring reports are provided to the AmeriCorps Portfolio Manager, for awareness.

11.3.2 Monitoring Results and Corrective Action
At the completion of monitoring activities, OM communicates monitoring results to grantees, including findings of noncompliance, in order to mitigate financial, programmatic and operational risks and resolve
noncompliance. OM consults with the ORO Portfolio Manager (PM) to share the monitoring results and review any corrective measures that may be required of the grantee.

If, during any phase of the monitoring activity, a monitoring official discovers potential waste, fraud, or abuse, this information will be reported to the AmeriCorps-OIG, per AmeriCorps Policy.

Monitoring results may include Findings, which are a violation of compliance with Federal statute, regulations, or AmeriCorps grant program policy. If a Finding is identified, OM will require the awardee to resolve the finding(s) of noncompliance by developing a Corrective Action Plan (CAP). OM will provide the awardee with a timeframe in which the CAP must be submitted, as well as a CAP template to help determine the root cause of the issue(s), appropriate corrective measures, and measurable outcomes that indicate whether the finding(s) was resolved. OM will coordinate consultation with the PM during the CAP development and implementation process as an added level of technical assistance in developing an efficient plan for avoiding future recurrence of noncompliance.

To facilitate this process OM will review the CAP submitted by the awardee and either:

- Approve the plan.
- Decline the plan and provide suggested modifications to be integrated into the CAP, to be resubmitted to OM for review and approval.

As findings of noncompliance may significantly vary between awardees, so may the timeframe for implementing resolution and improvement. OM will approve plans that have demonstrated resolution of noncompliance and will require awardees to make the corrective actions completable within a year.

For findings requiring continuous improvement, OM will approve the plan for grantee implementation and evaluate the impact of the CAP in future monitoring assessments. In general, the nature of the findings and size of federal funding will dictate the level and timing of resources contributed to validating the CAP’s outcomes and resolution of noncompliance.

Depending on the nature of noncompliance and applicable AmeriCorps policy, OM may recommend one or more enforcement actions such as disallowing costs, withholding of further grant payments, or wholly or partly suspending the grant, pending corrective action. OM may also recommend the termination of the grant for cause.

11.4 MONITORING RESOURCES

The resources on the AmeriCorps Mentoring page are currently aimed at the Office of Monitoring’s second round of monitoring. The page hosts resources that sponsors need to access to comply with monitoring requests as of April, 2021. While sponsors may access anything hosted on this page, AmeriCorps would like to emphasize that the development of our office means that future processes and resources may change.

11.4.1 Resources

- Remote Monitoring - At a Glance
- Overview of Uniform Monitoring Package (UMP)
- Guide to Developing Corrective Action Plans
- Segregation of Duties Worksheet
AmeriCorps Seniors Senior Companion Program Operations Handbook Chapter 11: Reports and Recordkeeping

- List of Subawards Worksheet
- Office of Monitoring FAQs
- Recommendations for Effective NSCHC Policies & Procedures

11.5 EFFECTIVE PRACTICES IN REPORTS AND RECORDKEEPING

A. The project is familiar with the reports required to fulfill the grant terms and conditions, and regularly submits accurate reports by the required deadlines, including:
   1. Semi Annual and Annual Progress Report
   2. Progress Report Supplemental (Annually);

B. The project discusses reports and requirements with its Portfolio Manager if any information requested is unclear.

C. The project designates accounting professionals within the sponsoring organization to take the lead in financial reporting.

D. The project develops an overall information collection and reporting system plan.
   1. The project uses the Project Work Plans and Performance Measures as blueprints to guide systems that will capture information and data for reporting.
   2. If possible, the project invests in a volunteer management software tool to streamline and automate its ongoing data collection and volunteer tracking. See Appendix A.6 for a list of software packages available and vendor contact information.

E. For performance measurement data collection and reporting, the project:
   1. Works in conjunction with the volunteer stations hosting the volunteers. The project coordinates with volunteer station supervisors to link into the station’s data and reporting systems, rather than independently establishing its own unique systems. Volunteer stations exist to deliver specific services to the community and those served and will likely have methods and resource persons available that can be utilized to track volunteer accomplishments without having to start from scratch.
   2. Ensures that the volunteer station supervisors and personnel who will assist with data and information collection understand the needs related to the AmeriCorps Seniors volunteers if the project’s request includes or anticipates new data elements or types of information.
   3. Incorporates data and information collection into the Memorandum of Understanding with the volunteer station.

F. The project directors are encouraged to communicate with other AmeriCorps Seniors project directors to share ideas, receive recommendations, trade tips, and provide suggestions and support.
12 COMMUNITY PARTNERSHIPS AND COLLABORATION

12.1 COORDINATION WITH OTHER AMERICORPS PROGRAMS AND COMMUNITY ORGANIZATIONS

Days of service and special initiatives are an integral part of the way that AmeriCorps meets our mission. They allow us to showcase at a national and local level how our service supports specific issues. Each grantee can participate in these events in a variety of ways that range from hosting an event that aligns particularly well with the sponsoring organization’s mission to collaborating with other AmeriCorps streams of service to remain engaged and connected to our shared vision.

The sponsor is highly encouraged to coordinate activities with other AmeriCorps programs, including AmeriCorps State and National, AmeriCorps NCCC, AmeriCorps VISTA, the Social Innovation Fund and the Volunteer Generation Fund. Moreover, the sponsor can coordinate activities with other project-related groups and individuals that have strategic objectives similar to those of AmeriCorps, such as those representing state and local governments, State Service Commissions; industry, labor, and volunteer organizations; programs for children; programs for the aging; and health-care organizations. The goal of such coordination is to facilitate cooperation with existing or planned community services and to develop community support. These coordination activities are specifically encouraged around the following programmatic activities:

a) National Days of Service: Each year AmeriCorps spearheads the effort to encourage Americans to volunteer in their communities during the Martin Luther King Jr. Day of Service and the September 11th National Day of Service and Remembrance. On these days of service, AmeriCorps provides tools and resources for organizations and individuals to become engaged in service activities. Joining together with regional or local national service programs increases the visibility of the service projects and reduces duplication of administrative efforts to coordinate events.

b) Special Initiatives: AmeriCorps supports a variety of special initiatives such as National Service Recognition Day and National Mentoring Month. These events and priorities, like National Days of Service, are best implemented in your community in partnership with other national service projects serving in your region.

c) Coordinated Recruitment: In some communities national service programs are looking to recruit distinctly separate candidates in the same communities. Coordinating around recruitment efforts and encouraging referrals when a candidate is not a good fit for your program but maybe a good fit for another program strengthens the national service network and helps everyone meet their recruitment goals.

Sponsors should use sound planning and preparation to generate local support. Development of cost sharing support can be facilitated by integrating the project into the community. Suggested steps toward achieving coordination are:

a) Prepare a brief summary of the project, its plans and accomplishments, its value to the community, and a statement of the types and amounts of support it needs.
b) Conduct a thoughtful assessment of the stakeholders of your program. Stakeholders include all organizations, businesses, and municipalities, which are benefiting from the impact of your program. Stakeholders could also include any organizations that are working toward the same goals in your service area.

1. Schedule meetings with stakeholders and individuals or groups who can contribute to the project or who can influence others to contribute.

2. Follow up the meeting with each person or group contacted with a thank you, additional information, or an opportunity to continue to work together.

3. Strengthen the above activities by involving selected members of the AmeriCorps Seniors SCP advisory council.

4. Collaborate with other AmeriCorps Seniors projects to generate statewide, citywide, countywide, and multi-county support.

12.2 PUBLIC AWARENESS

1) A strong community relations program ensures public awareness of start-up activities and continuing project development.

2) The project sponsor should keep social service agencies; city, county, and state elected officials; governmental department heads; community organizations, including those serving senior citizens; and the media updated about the project’s development, services, growth, and accomplishments.

3) Public awareness can be advanced through public speaking appearances by staff and advisory council members before service clubs, fraternal organizations, religious groups, and meetings with local, county, and state governmental units. Public relations materials about AmeriCorps's programs and media kit materials are available at the AmeriCorps website.

4) Active support of the AmeriCorps Seniors SCP advisory council enhances community interest in project activities. Some AmeriCorps Seniors SCP advisory councils have formed community relations or publicity and marketing committees which assist the project in building awareness, coordinating with other community groups, and speaking about AmeriCorps Seniors volunteers before organizations in which they are active.

5) AmeriCorps Seniors SCP is included in the AmeriCorps national advertising program. Through AmeriCorps's Office of External Affairs, continuing efforts are made to place program information and human-interest stories in national and local publications.

6) Public awareness of the nationwide program and of the local project should be promoted regularly through local media, a project website and social media accounts. Systematic contacts with newspapers, radio, and TV should be established and maintained. Announcements of local news value should be prepared and forwarded to the media. (See Chapter 1, Office of External Affairs, for more information and tools.) Some examples of newsworthy announcements are:

a) The establishment of a new volunteer station at a site that is of significant importance or well recognized in the community.
b) The appointment of new members to the AmeriCorps Seniors SCP advisory council or the establishment of a special committee of the advisory council that addresses issues that are significant to your community.

c) Statements made by elected officials, and other governmental and civic leaders in support of the project.

d) Achievement of a measurable impact on a critical community need.

e) Any special AmeriCorps Seniors SCP project event, such as key community service projects and the presentation of awards to the volunteers or to the project staff for significant achievements.

f) Engagement of the community and the volunteers around the National Days of Service or other AmeriCorps Special Initiatives.

7) Engaging in social media is a vital part of a modern public engagement plan. With the popularity of social media many community members are learning about the news in their community through social media platforms. For many projects, social media engagement is the driving vehicle for recruitment, recognition and communicating the impact of their program.

8) Particularly in smaller communities, the news media are usually interested in providing time or space for interviews with AmeriCorps Seniors volunteers or project staff. They are especially receptive to human interest stories.

12.3 EFFECTIVE PRACTICES IN COMMUNITY RELATIONS

I. Effective Practices for Increasing the Visibility of Service to the Community by Older Volunteers

The project:

A. Develops, implements, and periodically updates a plan to promote ongoing community awareness of and support for the project.

B. Makes presentations about the project to community organizations and interested parties;

C. Has a media awareness campaign to promote community awareness and support;

D. Has a presence on social media platforms;

E. Develops active roles for all stakeholders, including sponsor staff, project director, sponsor Board, volunteers, AmeriCorps Seniors SCP advisory council, and volunteer station staff, in promoting the project in the community;

F. Can demonstrate that the community recognizes the project’s contributions to meeting community needs by acknowledging the project or individual volunteers;

G. Broadly disseminates information on project accomplishment and impact to the community, volunteer stations, volunteers, funding supporters, other community agencies, the general public, the AmeriCorps Seniors, and other key stakeholders so that:
H. The community perceives the project as a leader in effectively meeting critical community needs; and

I. The community perceives AmeriCorps Seniors volunteers as active seniors who meet critical community needs.

II. Effective Practices for Coordinating AmeriCorps Seniors SCP Services

The project and volunteer stations:

A. Collaborate with other AmeriCorps funded national service programs, including AmeriCorps VISTA, AmeriCorps State and National, AmeriCorps NCCC, the Social Innovation Fund, the Volunteer Generation Fund, and other AmeriCorps Seniors programs, to meet critical community needs;

B. Participate in the National Days of Service and AmeriCorps Special Initiatives in partnership with other national service projects in their service area; and

C. Build broad-based relationships in the community, including the business sector, to gain their support for older volunteers.
## URL Links and Appendices Documents by Chapter

This index lists the links and appendices documents that are included in the AmeriCorps Seniors SCP Handbook for easy reference. The chart lists the chapter, the name of the link, the complete URL that you can click or cut-and-paste into your browser, and the number and title of the appendix document.

Links to [AmeriCorps Seniors SCP Program Regulations](#): All of the Handbook chapters have links to the Electronic Code of Federal Regulations. The regulations governing AmeriCorps Seniors SCP are in Chapter XXV, Part 2551, of the Code of Federal Regulations which is typically cited as “45 CFR 2551.” Use the reference numbers in the link to find the specific regulation you need. (For example: [45 CFR 2551.22](#) refers to the Responsibilities of AmeriCorps Seniors SCP Sponsors.)

URL for 45 CFR 2551:
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### Appendix C.3
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**Chapter 12**

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14 DESCRIPTION AND LIST OF APPENDICES

In the January 2017 revision of these handbooks, AmeriCorps Seniors revised the organization of the handbook appendices to clarify when appendices were the same across workbooks and improve our ability to update them quickly and accurately. Specifically, we combined the appendices of all three AmeriCorps Seniors handbooks (the Foster Grandparent Operations Handbook, Senior Companion Operations Handbook and RSVP Operations Handbook) into one list.

You can view the full list of appendices in both PDF and, when applicable, editable Word or Excel formats at the AmeriCorps Seniors SCP grantees page.

In addition, we introduced a numbering system to indicate what appendices would be relevant for what programs. The appendices are organized as follows:

- Section A: These appendices apply equally to all AmeriCorps Seniors programs.
- Section B: These appendices apply only to the AmeriCorps Seniors RSVP Program.
- Section C: These appendices apply equally to the AmeriCorps Seniors Foster Grandparent and Senior Companion Programs
- Section D: These appendices apply only to the AmeriCorps Seniors Foster Grandparent Program
- Section E: These appendices apply only to the AmeriCorps Seniors Senior Companion Program

In the printable version of this handbook, we have included only the appendices that are relevant to your program. In the case of AmeriCorps Seniors Senior Companion Programs, this includes Sections A, C and E. A full list of the appendices included in this document follows.

SECTION A: ALL PROGRAMS

A.1. Guidance on Recognition Costs
A.2. Primer on Civil Rights Compliance
A.3. Guidance on Closing Out Your AmeriCorps Grant
A.4. AmeriCorps Seniors Progress Report Tips
A.5. Quick Reference Guide for AmeriCorps Seniors Reports and Due Dates
A.6. Volunteer Tracking Software Distributors
A.7. Acronyms Related to AmeriCorps
A.8. Fundraising FAQs: Forthcoming
A.9. Optional Checklist for Station Accessibility
A.10. AmeriCorps Seniors Minimum Insurance Coverage Requirements
A.11. Evidence-Based Programs and Registries
A.12. Guidance on Fee-for-Service Prohibition
A.13. Sample Data Sharing Agreement
A.14. Sample In-Kind Contribution Form
A.15. Final Rule Overview
A.16. Final Review FAQs
A.17. COVID-19 Resource Tool Kit
A.18. Technology Support Training
A.19. Respite Survey
A.20. Independent Living Survey
A.21. Disaster and Emergency Response
A.22. Review and Update Project Information in eGrants
A.23. Understanding the Roles and Responsibilities of Advisory Councils

SECTION C: AMERICORPS SENIORS FOSTER GRANDPARENT AND SENIOR COMPANION PROGRAMS

C.1. Sample FGP-AmeriCorps Seniors SCP Memorandum of Understanding
C.2. Sample FGP-AmeriCorps Seniors SCP Volunteer Enrollment Form
C.3. Sample FGP-AmeriCorps Seniors SCP Timesheet and Mileage Form
C.4. Sample FGP-AmeriCorps Seniors SCP Project Director Job Description
C.5. Sample FGP-AmeriCorps Seniors SCP Volunteer Information Update Form
C.6. Sample FGP-AmeriCorps Seniors SCP Income Review Form
C.7. Sample FGP-AmeriCorps Seniors SCP Enrollment Checklist
C.8. Sample VSY Worksheet
C.9. Sample FGP-AmeriCorps Seniors SCP Volunteer File Checklist
C.10. Sample FGP-AmeriCorps Seniors SCP Letters of Agreement for In-Home Assignments
C.11. Sample FGP-AmeriCorps Seniors SCP TB Test Form
C.12. Sample FGP-AmeriCorps Seniors SCP Physical Form
C.13. Guidance on Social Security Disability

SECTION E: AMERICORPS SENIORS SENIOR COMPANION PROGRAMS ONLY

E.1. Sample AmeriCorps Seniors SCP Volunteer Assignment Plan
E.2. Sample Senior Companion Position Descriptions
E.3. Previous Change Logs
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