

Coronavirus: Guidance & Resources for AmeriCorps Texas Programs

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Last updated March 19, 2020

OneStar is closely monitoring the novel coronavirus (COVID-19) and the potential risk factors and implications on AmeriCorps Texas programming. To support our grantees, we have compiled the following guidance and resources, which also contains useful reference material for all Texas nonprofits.

We recommend that AmeriCorps Texas programs take the following steps to prepare and protect their members and the communities they serve.

Guidance for AmeriCorps Texas Programs

- **Review [COVID-19 FAQs](#) issued by CNCS** for guidance in the event of service site closures, member exposure, event cancellations, and other potential scenarios. This information is being updated on a rolling basis, so please check back for the latest updates. If you have additional questions or would like to discuss a specific situation encountered by your program please contact your OneStar Program Officer.
- **Register for the AmeriCorps Texas COVID-19 Weekly Update Call series.** These webinars will be conducted weekly Thursday 2-3 PM CST through April 6, 2020. During these sessions, we will review guidance shared over the past week, answer questions, and allow AmeriCorps Texas programs to share best practices with one another. All calls will be recorded and shared here.
 - View past recordings: [March 13](#) | [March 19](#)
- **Review the OneStar e-mail archive** for specific program and fiscal guidance sent to all AmeriCorps Texas grantees regarding the COVID-19 response.
 - **Fiscal COVID 19 Updates** (*sent March 18*)
Contains guidance on increasing living allowance payments, budget reallocation requests, insurance, and additional financial support to members.
 - **COVID-19 Updates** (*sent March 17*)
Shares a list of alternative service and training activity ideas and provides instructions on how to report alternative activities to OneStar.

- **AmeriCorps Texas COVID-19 Update Call Recording + Updated FAQs** (*sent March 13*)

Summarizes key points from the portfolio-wide March 13 Update call regarding performance indicator expectations and exit for compelling personal circumstances and contains sample teleservice policies.

- **Check out these ideas for alternative service and training activities for AmeriCorps Texas members**, and report to OneStar if your program plans to reassign members from their regular service activities. Programs may develop alternative service activities that are not currently in your approved grant if normal service activities are disrupted. Please keep in mind that these activities can not be prohibited nor unallowable. Pre-approval is not required to deviate activities; OneStar will share guidance on how to document approval of these changes in the coming days.
- **Review your program's member safety policy and procedures** and update them as needed.
- **Review and update your program's teleservice policy and procedures.** If you are considering remote service possibilities for your members, you must have a written policy and procedure in place that aligns with the AmeriCorps State and National Teleservice Guidance from CNCS.
- **Share Member Assistance Program (MAP) resources, or program-provided mental health resources, with your members** during this time. If you are unsure how to access these resources please reach out to your Program Officer.

If your AmeriCorps program **experiences service site closures due to COVID-19 or if a member or program staff has a confirmed/suspected case of COVID-19 or been exposed to COVID-19 or anyone under quarantine**, please notify your Program Officer IMMEDIATELY.

[FAQs](#)

These FAQs do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. You should refer to CNCS's statute and regulations for applicable requirements.

1. In the event that AmeriCorps State and National service locations are closed (e.g., schools, etc.), or the grantee cannot continue its funded service activity because of disruption at one or more service site due to COVID-19, will CNCS permit service activities that are not included in approved notice of grant agreement, such as food delivery to families under quarantine?

If a service activity is disrupted due to COVID-19, grant recipients may develop other types of service activities that are not specifically defined in the grant and should obtain written (email) approval from their Program Officer/Portfolio Manager as soon as practicable. New activities must not be otherwise prohibited or unallowable (e.g., lobbying). The new approved service activity can begin immediately, and

the grant recipient should expect to take steps to amend the grant. In the meantime, the grantee should carefully document all the costs associated with the new service activities. **[updated 3/12]**

Some important reminders:

1. Programs should, of course, prioritize protecting the health and safety of members. If the members will need specific training, protective equipment, or other precautions to carry out the new service activities safely, the program should ensure that it can be provided.
2. It is always the responsibility of the grantee/program to ensure that the service activities are compliant. Even though a PO/PM can give preliminary approval for an activity, if it is determined later that the activities were not compliant, the grantees may be subject to disallowance or other sanctions. [updated 03/20]

2. May AmeriCorps State & National members earn hours when their service sites are closed due to COVID-19?

To earn hours, a member must engage in service activity. 42 U.S.C. §12602 (a)(2). Accordingly, grant recipients may not give members constructive credit for hours that were not served. However, to the extent training or teleservice is possible, CNCS will generously approve such deviations from the grantee's normal policies and practices if the deviation is documented and approved by the grantee's leadership and the planned national service is disrupted due to COVID-19. **[updated 3/12]**

3. In light of the FAQ related to payment of stipends during service interruptions, should programs suspend members from the program if service locations are closed?

Programs may decide to suspend AmeriCorps members during a service interruption because COVID-19 temporarily halts the member's service period. Grant recipients may develop alternative activities for the members. **[updated 3/12]**

4. Do you anticipate a change to the teleservice policy for AmeriCorps State and National members? If a site were to close for more than 2 days within a pay period, are members allowed to teleserve for more than those 2 days?

CNCS considers the COVID-19-related challenges facing AmeriCorps State and National grantees to be a rare and unique circumstance where programs might increasingly employ teleservice when it is appropriate and compatible for achieving program objectives. AmeriCorps State and National's policy is that teleservice should be rare and thus does not specify a maximum number of days that teleservice is allowed. AmeriCorps State and National does not anticipate changing existing teleservice guidance. The AmeriCorps State and National guidance on teleservice can be found here:

<https://www.nationalservice.gov/sites/default/files/documents/ASN%20006%20Teleservice%20Guidance.pdf>. **[updated 3/12]**

5. Is CNCS going to cut the number of required service hours to be eligible for a full Segal Education Award if an AmeriCorps State and National member's site is closed due to COVID-19?

CNCS does not have the authority to reduce the number of service hours required to be eligible for a full Segal Education Award. AmeriCorps State and National grantees have the option to suspend members and reinstate them later, when circumstances allow, or they may exit the member for CPC due the closure of the service location. **[updated 3/12]**

6. If we have a member who is exposed to or diagnosed with COVID-19, do we need to notify CNCS?

Yes, on a voluntary basis, please notify your Program Officer or Portfolio Manager if you have a member who is diagnosed with COVID-19. Share the project name, city location and number of members diagnosed. In order to protect the privacy of the individual, please do not share their name or other personally identifiable information. You should follow guidance provided by the CDC and your local health department. **[updated 3/17]**

7. May AmeriCorps State and National members be paid living allowances while Suspended from service due to program closures related to the COVID-19?

In order to provide grantees the maximum flexibility as a result of COVID-19, CNCS has determined that AmeriCorps State and National members may be paid living allowances and benefits while they are in a Suspended from Service status, if the reason for suspension is due to COVID-19. Programs can also elect not to pay living allowances if they suspend their AmeriCorps State and National members. If an individual is suspended for any other reason, the living allowance and other benefits are also to be suspended. If a grantee organization decides to continue to pay members while they are in a Suspended status, they must be prepared to obtain additional funding to cover living allowance and benefit expenses once members are reinstated. Programs should keep in mind that if or when they re-start the program and take members off suspension, they will have to continue paying the living allowance and benefits as members accrue hours. This may necessitate some programs raising additional funds for those costs as they are unlikely to have budgeted for living allowances and benefits beyond their initial program duration. **[updated 3/13]**

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

Within AmeriCorps State and National, grantees determine compelling personal circumstances. Extended

site closures and sustained disruptions could reasonably justify a compelling personal circumstances exit under 45 CFR § 2522.230 (a) Release for compelling personal circumstances.

9. If an AmeriCorps State and National program allows members to do additional training at a time that they cannot serve at their sites, will they be allowed to exceed the maximum 20 percent aggregate training hours?

No, per 45 CFR § 2520.50 How much time may AmeriCorps members in my program spend in education and training activities?, “No more than 20 percent of the aggregate of all AmeriCorps member service hours in your program, as reflected in the member enrollments in the National Service Trust, may be spent in education and training activities.” *[updated 3/16]*

10. Is CNCS Program Officer/Portfolio Manager approval needed before programs may begin engaging in alternative member activities given the language in the Program Specific Grant Terms and Conditions regarding requests during officially declared state or national disasters?

Yes, an email confirmation is required before you start alternative activities. Once you have the email confirmation, additional information may be requested but your request for alternative member activities does not have to be completed before you redirect your members. A federal State of Emergency is distinct from an officially-declared disaster. Therefore, grantees should follow the COVID-19 FAQ on alternative service activities where a state or federal disaster has not been declared. Where an officially-declared state or national disaster has been declared, the AmeriCorps State and National Program Specific Terms and Conditions on disaster-related programmatic changes are applicable. But please remember, the terms and conditions also state: “While written approval from CNCS is not required before making disaster-related programmatic changes, CNCS reserves the right to limit or deny disaster-related programmatic changes, including disallowing costs associated with the disaster related activities.” *[updated 03/20]*

11. As an alternative member service activity, can AmeriCorps State and National members assist grocery markets or pharmacies in delivering foods and medicines to quarantined people or other disadvantaged people?

No, AmeriCorps State and National members are statutorily prohibited from engaging in any service that “provides a direct benefit to” a business organized for profit. AmeriCorps members may be engaged in the distribution of food or medicine on behalf of public school districts, other public entities, or nonprofit organizations. We invite programs to think creatively so that we can approve your alternative member service activities. *[updated 03/20]*

12. I am currently conducting an evaluation of my AmeriCorps-funded program, but closures of service locations and/or disruptions to service activities due to COVID-19 are interfering with data collection for the evaluation. Can the timeline for my evaluation be extended?

Yes, grantees whose evaluations are affected by COVID-19 are eligible to apply for this type of relief – Alternative Evaluation Approach (AEA). The [AmeriCorps State and National Alternative Evaluation Approach \(AEA\) guidance](#) allows grantees to request an extended timeline for an evaluation that cannot be completed during the current grant cycle. Please follow the instructions in the AEA guidance for how to submit an AEA request outside of the recompetes grant application process. **[updated 03/20]**

13. Closures and disruptions due to COVID-19 are making it difficult for me to complete my Grantee Progress Report. Can the GPR due date be extended?

The Grantee Progress Report instructions state the following:

If you cannot meet the submission deadline for the progress report, you must request an extension from your Program Officer/Portfolio Manager. Requests for extensions may be granted when:

1. The report cannot be finished in a timely manner for reasons legitimately beyond the control of the grantee, and
2. CNCS receives a request explaining the need for an extension before the due date of the report.

Closures and service disruptions related to COVID-19 qualify as “reasons legitimately beyond the control of the grantee,” and so are a legitimate basis to request a GPR due date extension. Please contact your Program Officer/Portfolio Manager if you need to request an extension. **[updated 03/20]**