MEMO
To: AmeriCorps Kansas Programs
From: Jessica Noble, KVC Executive Director
Date: April 16, 2020
Re: COVID-19 Follow-Up Guidance

SUMMARY
This second memo related to COVID-19 restates in one place as clearly as possible Kansas Volunteer Commission (KVC) guidance and policy for AmeriCorps grant management in response to the pandemic. Keep a copy of this Memo for your grant records.

The most helpful resource right now will be the CNCS COVID-19 FAQs: https://www.nationalservice.gov/coronavirus, Check back often as they are frequently updated.

LIVING ALLOWANCE AND BENEFITS
As a matter of member safety, KVC urges programs to continue living allowance and program benefits to members regardless of their activities or hours completed. Those minimal funds support housing and food needs, and it is likely that shift jobs or alternative incomes will be impacted by COVID-19. Whereas KVC normally recommends that programs develop a policy to not pay living allowance during a payment period in which a member records zero hours of service, we strongly encourage programs to pay living allowance even in this scenario. Any change in policy should be documented with the effective dates in a Memo to File.

Suspension and Living Allowance
Suspension of service is a tool available to all programs for individual, case by
case, member management. Programs considering Suspension status due to COVID-19 are asked to consult with the KVC. In order to provide programs the maximum flexibility as a result of COVID-19, CNCS has determined that AmeriCorps 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. This is an exception to the regular policy that suspended members are to receive no living allowance.

Programs can also elect not to pay living allowances if they suspend their AmeriCorps members. If a program 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.

If an individual is suspended for any other reason than COVID-19, the living allowance and other benefits are also to be suspended.

Likewise, a member suspended due to COVID-19 activities may continue to receive the child care benefit (for up to 12 weeks) and health care benefit provided by the grant recipient. To ensure no lapse in child care coverage, the AmeriCorps program must notify GAP Solutions in writing within five business days after a member’s status changes. Costs incurred due to the program’s failure to keep GAP Solutions immediately informed of changes in a member’s status may be charged to the program’s organization.

**ALTERNATIVE SERVICE ACTIVITIES**

KVC asks you to consider the intended purpose of AmeriCorps over and beyond immediate concerns – to Get Things Done for America. Individuals who stay in AmeriCorps have a special character - they want to help and you can mobilize AmeriCorps members to make a significant difference in this time of national crisis. Your AmeriCorps grant commits to a specific program design and performance measures. In response to COVID-19, however, AmeriCorps members may be unable to perform planned activities, and you may simply determine that the community has new priorities. KVC urges programs to plan alternative service for members that allows them to complete their terms, earning a full education award, and supports communities in these uncertain times. Where members are safe and willing to do so, they should be volunteering. Please utilize the Decision-Making Chart for Allowable Member Activities as a tool.
CNCS has indicated that blood donation is an allowable service activity.

**Effective March 2, 2020 through the remainder of the 2019-2020 grant period, Kansas Volunteer Commission permits programs and their members to perform service activities in response to COVID-19 community needs that are not specifically defined in their approved grant. New activities must not be otherwise prohibited or unallowable.**

Do not neglect to document alternative service activities. Where activities are repeated or ongoing, programs should provide an amendment, signed by both program staff and AmeriCorps member, to the Member Service Agreement describing the new assignment(s).

**BACKGROUND CHECKS**
Despite the interference and closures due to COVID-19, all required National Service Criminal History Checks (NSCHC) must still be performed in accordance with requirements. All AmeriCorps Kansas members have recurring access to vulnerable populations and therefore need the NSOPW check through Truescreen and the FBI check through Fieldprint. The state check is not necessary as Kansas participates in NFF and is covered with the FBI check. These checks must be initiated and completed prior to the start of service in order for the member to serve unaccompanied.

As of March 18, 2020, CNCS-contracted NSCHC vendors Fieldprint and Truescreen are operating. However, certain Livescan fingerprint locations may be closed due to business-specific reasons and/or local government requirements. To see which Livescan sites are closed, you may check site availability on [www.Fieldprintcnsc.com/](http://www.Fieldprintcnsc.com/).

Livescan locations closed due to COVID-19 are allowing appointments to be scheduled for future dates. Grant recipients may elect to order fingerprint cards or schedule Livescan appointments for a future time when a local site expects to reopen. Livescan has indicated that no rescheduling fees will be applied until further notice.

**ACCOMPANIMENT**
Given the unknown timeframe for FBI checks, programs may also decide to allow
members to serve with accompaniment. In order for this to happen, the results of the NSOPW must be reviewed and documented AND the FBI check initiated prior to the individual starting service (before service or training hours are charged to the grant, federal or match). An individual may not accrue hours towards their service without first having cleared the NSOPW component of the NSCHC and initiated the FBI background check.

Initiating FBI checks is going one step further than getting permission to conduct an NSCHC. This could include, for example, fingerprinting, sending requests to a state repository to get checks, or having candidates fill out official forms for getting the required checks. You must be able to document how and when checks were initiated. You must have policies and procedures outlining how you initiate checks and apply them consistently. CNCS has affirmed that ordering fingerprint cards or scheduling a Livescan appointment may be considered initiation of a check.

Until the results of the FBI check are received, reviewed and documented, the individual must serve in the physical presence of someone already cleared to work with vulnerable populations WHENEVER the member has access to vulnerable populations. Accompaniment is not required at times when the member does not have access to vulnerable populations (training, civic reflections, curriculum prep, research, etc.). The majority of teleservice activities will fall under the “not working with vulnerable populations” category and therefore do not require accompaniment. However, if the member is serving with youth, older adults or individuals with disabilities, even in a virtual environment, then accompaniment is required.

The individual providing accompaniment must be a staff member and must have completed background checks, as required by the organization (not CNCS). Accompaniment must be documented with the time, date, and name of individual providing accompaniment. Some organizations use time sheets to document this information.

**COMPELLING PERSONAL CIRCUMSTANCES**

COVID-19 will cause extended site closures and sustained disruptions to AmeriCorps members’ service that can reasonably justify a compelling personal circumstances (CPC) exit under 45 CFR § 2522.230 (a) Release for compelling personal circumstances. While KVC intends that all members shall complete their term of service this year, it is reasonable to expect that will not happen.
Kansas Volunteer Commission approves all program requests to exit members who enrolled prior to March 2nd and exit before August 30, 2020 with the designation compelling personal circumstances due to a disruption of service from COVID-19.

To be eligible for CPC, a member must first have completed at least 15% of the hours in their term of service. A CPC exit means that a member can receive a prorated education award and serve in AmeriCorps again (see next section for further guidance). Programs should submit the AmeriCorps Kansas Change of Status Worksheet and document that the reason was “disruption of service due to COVID-19” and submit to jnoble@ksde.org. *Do not include medical documentation.* The CDC has asked that such paperwork requests be avoided so as to allow medical professionals to prioritize care. For documentation instead, retain a copy of the relevant executive order from the Governor ordering social distancing measures and/or announcement of school closures:


A CPC exit would also be acceptable in the event a member is suspended and restarts at a later date but is still unable to complete their term of service before the grant end date. It is the preference of the KVC that members be exited for CPC rather than requesting a no-cost extension to allow members to finish their hours.

**SEGAL AMERICORPS EDUCATION AWARDS**

AmeriCorps members exited for a CPC due to COVID-19, may be eligible for a partial or full Segal AmeriCorps education award. Pay special attention to the percentage categories and the percent of time each member has served. If the member is close to the next category threshold, programs are encouraged to try and find training and service opportunities for the member so that he/she earns the highest possible education award. Below are three situations that have different outcomes:

**SERVED LESS THAN 15 PERCENT**

AmeriCorps members that have served less than 15 percent of the minimum
required hours for the term of service at time of exit are not eligible for a partial education award. Nor are these members eligible for a full education award with a compelling personal circumstance exit related to COVID-19.

**SERVED 15 PERCENT AND 50 PERCENT**

AmeriCorps members that have served between 15 percent and 50 percent of the minimum required hours for the term of service at the time they are exited may be exited for compelling personal circumstances proportional to the number of hours they have served. They are not eligible for a full education award with a compelling personal circumstance exit related to COVID-19.

**SERVED MORE THAN 50 PERCENT**

AmeriCorps members that have served more than 50 percent of the minimum hours required to successfully complete their term of service will be eligible to receive the full education award amount with a compelling personal circumstance exit related to COVID-19. Compelling personal circumstances are the determination of the AmeriCorps program.

In order to exit those members who have served more than 50 percent of the minimum required hours for a term of service, programs will complete the following two-part process:

1. Exit of the member
2. Document the difference between the served hours and the hours entered on the exit form

**Part 1: Exit of the member**

Program’s will enter the minimum number of hours needed for a full award for the member’s term of service; and exit the member with a status of “Eligible for Partial Award (member did not complete service for compelling personal reasons).”

For example - A full-time member served 1,500 hours of the required 1,700 hour term. The program determines the member is eligible for CPC due to COVID-19 and they have served more than 50% of hours. They will enter 1,700 in the hours of service served section and select “eligible for partial award” as the education award status. This will result in them getting a full award for their slot type - in this case a full education award.
Part 2: Document the difference between the served hours and the hours entered on the exit form

Each time an AmeriCorps program exits a member for CPC-related to COVID 19 (and the member is entitled to the full education award), the program will submit an email to the KVC (jnoble@ksde.org) identifying the following:

- Name of member and their NSPID,
- Number hours served by the member,
- Term of service the member was enrolled in; and
- Number of hours NOT served due to COVID-19 (which should equal the full hours reported on the member exit form).

This should be submitted immediately following the exit of the member in eGrants. It is not necessary to submit this information for members who served less than 15 percent of their term or between 15 and 50 percent of their term. This is only for members who served at least 50 percent of their term and are exited for a CPC related to COVID-19.

MATCH WAIVER

CNCS is waiving all match requirements for all AmeriCorps State and National (ASN) cost reimbursement grants that were awarded in FY 2019 and will be awarded in FY 2020.

There is no action that AmeriCorps Kansas subgrantees need to take in order to take advantage of this waiver in full or part. CNCS will provide additional information in the near future about the implementation process. For now, you may continue to log match in the monthly PERs in OnCorps or cease recording match all together. If you log the match, then you must continue to maintain the documentation for monitoring purposes.