



Volunteer Tennessee



TO: Team Tennessee Program Directors

FROM: Monica Hodges, AmeriCorps Program Manager

CC: Jim Snell, Executive Director; Daniel Sparkman, AmeriCorps Program Manager

DATE: March 23, 2020

RE: COVID-19 Guidance and Pre-Approval Statements

Effective Date: The guidance in this memo is retroactively effective to March 2, 2020.

Summary: This memo related to COVID-19 states as clearly as possible Volunteer Tennessee guidance for AmeriCorps grant management in response to the pandemic. Look for bolded statements on alternative service hours, compelling circumstances, and expenditures that empower you to act to support AmeriCorps members and serve Tennessee. Keep a copy of this Memo for your grant records. In addition to this guidance, we recommend that you regularly consult the CNCS COVID-19 FAQs at <https://www.nationalservice.gov/coronavirus>.

Reasonable Accommodations

If an AmeriCorps member notifies their program that they have a compromised immune system or are high risk to infection, the program should follow their reasonable accommodations procedures and determine an appropriate alternative service for the member.

LIVING ALLOWANCE AND BENEFITS

As a matter of member safety, Volunteer Tennessee urges grantees 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 Volunteer Tennessee normally recommends that grantees develop a policy to not pay living allowance during a payment period in which a member records zero hours of service, we strongly encourage grantees 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 for compelling personal circumstance (CPC) is a tool available to all grantees for individual member management (see also the "Early Exit for Compelling Personal Circumstances" section below). Programs are ultimately responsible for determining if a CPC exists, and suspensions for CPC must be completed in the My AmeriCorps Portal in a timely manner. In order to provide programs 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. This is an exception to the regular CNCS policy that suspended members are to receive no living allowance. Please note that programs may elect not to pay living allowances if they suspend their AmeriCorps State and National members; however, you must be consistent in how you treat member living allowance during a suspension due to COVID-19. If a program decides to continue to pay members while they are in a Suspended status, it 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 must continue paying the living allowance and benefits as members accrue hours. Programs may request budget revisions as needed to allow for increased spending on living allowances within CNCS maximums for the 2019-20 program year (full-time \$27,984; three quarter-time \$19,753; half-time \$14,815; reduced half-time \$11,111; quarter-time \$7,408; and minimum-time \$4,938).

Volunteer Tennessee is waiving the requirement for Cost-Reimbursement Programs to maintain their budgeted cost/MSY to allow them to fully spend their federally approved amount for the remainder of the 2019-2020 Program Year.

If an individual is suspended for any other reason than COVID-19, the living allowance should be suspended; however, your program may continue to provide other benefits as appropriate.

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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 program must notify GAP Solutions in writing within five business days after a member's status changes. Costs incurred due to the grantee's failure to keep GAP Solutions immediately informed of changes in a member's status may be charged to the grantee's organization.

ALTERNATIVE SERVICE ACTIVITIES

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 determine that the community has new priorities. Volunteer Tennessee 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 serving. Volunteer Tennessee is working with state agencies and partners to support your efforts in identifying alternative service opportunities.

Effective March 2, 2020 through the remainder of the 2019-2020 grant period, Volunteer Tennessee permits programs and their members to perform the following service activities in response to community needs that are not specifically defined in their approved grant:

Food Distribution and Prep- *Members will serve with organizations delivering and/or preparing food for vulnerable populations. These opportunities will be primarily coordinated with local organizations throughout the state in partnership with the TN Commission on Aging and Disability and the TN Department of Education.*

Disaster Recovery Efforts- *Members will serve with organizations in Middle TN working to address community needs related to the recovery from the March 3, 2020 tornados. Activities may include clearing debris, organizing and distributing donations, helping survivors with paperwork for financial relief, and serving in food pantries or distribution centers.*

Programs may request approval from Volunteer Tennessee for alternative service options outside of those listed above by emailing their AmeriCorps Program Manager. New activities must not be otherwise prohibited or unallowable. Additionally, members cannot recruit and/or manage volunteers to do any of the activities on the prohibited activities list. A list of these prohibited activities can be found at https://www.ecfr.gov/cgi-bin/text-id.x?SID=f11e85460f6d0f8966e318fa1740fe33&mc=true&node=se45.5.2520_165&rgn=div8. Alternative service activities should be differentiated on member timesheets from activities stated in approved grants.

TELESERVICE

This is a reminder that AmeriCorps members are permitted to serve remotely, or teleserve, if the published guidance from the Corporation for National and Community Service

(<https://www.nationalservice.gov/sites/default/files/documents/ASN%20006%20Teleservice%20Guidance.pdf>) is followed:

- Written authorization of teleservice in advance,
- Expectations of the communication requirements between supervisors and teleserving members,
- 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.

It is a best practice to first investigate the ability (e.g. access to internet) of individual members to serve remotely. Then establish a request form or process to document the procedures above. Volunteer Tennessee has published example policies and procedures in Basecamp. Volunteer Tennessee is also asking grantees to submit their teleservice policy and procedures for review. Time spent teleserving should be noted in some way on member timesheets.

EARLY EXIT FOR 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 exit under 45 CFR § 2522.230 (a) Release for compelling personal circumstances.

While Volunteer Tennessee expects that every member should complete their term of service this year, it is reasonable to expect that this will not happen in all cases.

Volunteer Tennessee supports programs in exiting members with compelling personal circumstances due to COVID-19.

To be eligible for CPC, a member must 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. As with all exits with compelling personal circumstances, programs must fully document the reason.

TRAINING LIMITATIONS

In addition to alternative service, grantees may conduct training with members, including online learning. It is important to note, however, that members cannot exceed the maximum 20 percent aggregate training hours. This is a federal rule that Volunteer Tennessee has no authority to waive -

[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.”

HEALTH AND SAFETY

The health of personnel and AmeriCorps members is everyone’s shared priority. Volunteer Tennessee directs grantees to comply with evolving guidelines from TN Governor Bill Lee and to take responsibility for communicating up-to-date information on preventing the spread of COVID-19 to AmeriCorps members, personnel, and the public. The best sources of COVID-19 information are:

- Centers for Disease Control (CDC): <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- CDC Guidance on Schools, Workplaces, and Community Locations: https://www.cdc.gov/coronavirus/2019ncov/community/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fpreparing-individuals-communities.html

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