AmeriCorps Grants 101

Things to Consider

# Introduction

Congratulations on your AmeriCorps Planning Grant! This time as a Planning Grantee offers a significant opportunity for your organization to plan, ask questions, design an AmeriCorps program, write an implementation grant application, and create policies, procedures and implementation plans that will help you become a successful AmeriCorps formula or competitive grantee. Not every planning grant will turn into an implementation grant. Sometimes the planning grantee realizes AmeriCorps is not a good fit for their organization, and sometimes a State Commission or AmeriCorps the Agency determines that the planning grantee is not yet ready to implement an AmeriCorps grant or is not a good fit for their AmeriCorps portfolio. To have the best chance of success, it’s very important that you take full advantage of this planning grant. Please do not underestimate the time and effort it will take to successfully apply for and start a federal AmeriCorps grant. Before you begin your planning grant work, it’s helpful to know some key information and to be aware of some important considerations.

# Planning Grant Timeline

Many Planning Grantees enter into the planning grant with the mistaken assumption that they will have 12 months to prepare and write their AmeriCorps implementation grant. In reality, planning grant timelines may vary widely from a few months to up to a year, but generally follow a pattern as detailed below:



Please note that the actual application is often 7 months or less into the planning grant period, with the remainder of the planning grant focused on processes to successfully implement a grant if the organization is successful in their application.

**Rules and Regulations**

Plan to spend a significant amount of time during the planning grant becoming familiar with the rules and regulations for AmeriCorps grants, as well as applicable state and federal requirements. This point cannot be over-emphasized. As a recipient of taxpayer-funded grants, it is your responsibility to know the rules and regulations that govern the use of these funds and to protect that investment; improper use may result in repayment of all or some of the funds and other possible actions.

* **AmeriCorps-specific Rules:**

In order to run an effective program, grantees must know the rules of AmeriCorps, which can be difficult to navigate even for organizations that have prior Federal grant experience. AmeriCorps requirements include the Statute, Regulations, Terms and Conditions, and Policies.

* + ***The Statute*** that authorizes federal funding for the AmeriCorps program is the National and Community Service Act of 1990. This Act has been amended several times since its original passage in 1990, including by the National and Community Service Trust Act of 1993, and most recently by the Edward M. Kennedy Serve America Act 0f 2009.
	+ ***The Regulations*** are AmeriCorps the Agency’s interpretations of the Statute and set out the Agency's purpose and powers, and the circumstances of applying the statute. Regulations are published in the Code of Federal Regulations (CFR). The AmeriCorps Regulations can be found in Title 45 of the Code of Federal Regulations, Chapter 25, beginning with section 2520.10. Citations for Regulations are written like this: 45 C.F.R. §2522.230 or abbreviated as §2522.230.
	+ ***Terms and Conditions*** are additional grant requirements that are issued each year. Citations for Terms and Conditions are written like this: [AC I. B.2].
	+ ***AmeriCorps State and National Policy FAQs*** consist of links to various FAQs and policy guidance provided to grantees.

The Regulations and Terms and Conditions are your primary sources of information on the day-to-day management of your grant. The items mentioned above are accessible via the AmeriCorps website: <https://americorps.gov/grantees-sponsors/directs-territories-tribes>.

* **Other Requirements**
	+ ***State Laws:*** AmeriCorps programs must become aware of the laws of the state(s) in which their members serve. For example, you should find out about the state laws pertaining to taxes, workers compensation, background checks, etc. that may apply to your proposed program. If you need assistance accessing this information, your State Service Commission can be a helpful resource.
	+ ***OMB Uniform Guidance:*** The Uniform Guidance is issued by the Office of Management and Budget (OMB) and outlines administrative requirements and cost principles for non-profit organizations, state and local governments, and educational institutions using federal funds. The Uniform Guidance (or Omni/Super Circular) streamlines the federal government's guidance on Administrative Requirements, Cost Principles, and Audit Requirements for federal awards. These modifications are a key component of a larger federal effort to more effectively focus federal resources on improving performance and outcomes while ensuring the financial integrity of taxpayer dollars in partnership with nonfederal stakeholders. Please see [2CFR 200](https://www.law.cornell.edu/cfr/text/2/part-200).

# Important Considerations

There are several key items for any Planning Grantee’s consideration that should be addressed early in the Planning Grant period.

### Budget Clarity

Many Planning Grantees enter into the Planning Grant period with the mistaken belief that because AmeriCorps is a federal grant, there will be substantial funds available to support program operations, however, there are significant limits to the size of AmeriCorps grants as laid out in the annual NOFO. Many programs have an eye-opening experience when they create their AmeriCorps budget, and they realize that they will not be able to pay their proposed members the maximum living allowance or will have to find other funds to cover some of the required program expenses. It’s imperative to understand early that an AmeriCorps grant will not save an organization in need of funds or resolve cash flow problems. In fact, an implementation grant will not cover the costs of overall organization operations and will not even fully cover the cost of implementing the AmeriCorps portion of the program operations. Inherent in an AmeriCorps grant is the requirement for match that increases with each of the first 10 years of AmeriCorps funding until it eventually reaches a dollar-for-dollar match. Match is the non-federal (in most cases) funds that the program will add to any AmeriCorps funds awarded in order to operate the AmeriCorps program. The underlying assumption of AmeriCorps grants is that the organization is bringing some of its own funds to the table to support the implementation of the grant.

There are numerous required expenses in an AmeriCorps grant, including: staff time and associated fringe, staff travel to required trainings, logoed member gear, member training costs, Criminal History Checks (CHC), and member living allowances and support costs. There are many additional costs that many programs choose to include such as member travel, staff training and professional development, office supplies/technology costs, program evaluation costs, rent and/or utilities. In most cases, AmeriCorps grants may cover a portion of the AmeriCorps member living allowances and benefits, a portion of a staff member’s time, the required Criminal History Background Checks, possibly some staff and/or member travel and training, and a very small amount of indirect costs. The remainder of the expenses will need to be covered by match or other organizational leveraged funds.

### Staffing

During the Planning Grant period, programs should ideally identify one or two designated staff people who will spend approximately 20-25% of their time working on the Planning Grant. Preferably, at least one of these staff people will implement the grant if the application is successful or will supervise the person that will implement the grant. This time will be dedicated to working on various documents that will support the program as they clearly define their program design, articulate that design in the implementation grant application process, and create policies, procedures and templates that will ensure the successful and compliant start-up of the grant.

Many State Commissions have a minimum requirement for staff time that must be budgeted to the grant. They may require a designated staff person to implement and manage the AmeriCorps grant for a set percentage of their time. Make sure you understand your State Commission’s requirements and are willing to budget both financial resources and staff time accordingly to follow them. It is not advisable to ask a staff person that already has a full-time job within the organization to take on AmeriCorps as well, without sincerely modifying their existing workload accordingly. Managing an AmeriCorps grant is a time and energy investment.

### Grant Start Dates

Many state formula grants begin on or after August 1 each year. State Commissions may require that programs operate on no more than an 11-month program cycle to allow time for member selection and grant start-up the next year. While there may be some flexibility of a month or so on either end for grant years, in general, the AmeriCorps grant timing is fairly rigid. If your program design does not and cannot fit an August/September start with a service year ending in June or July, then you may need to rethink your design and/or reconsider the type of AmeriCorps members you will have (consider TQT, HT, RHT, QT, MT slots).

### Allowable Activities

There are a variety of rules and regulations that dictate allowable service activities for AmeriCorps members and staff paid by AmeriCorps funds or match. You should become familiar with the AmeriCorps regulations and terms and conditions as noted above for a full understanding. There are a few types of activities that are frequently discussed during a Planning Grant and thus are worth noting here.

***Displacement/Supplantation***

For more information, review [45 CFR 2540.100](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=4193d25175e06a4c35ecfadf2e6252a0&rgn=div5&view=text&node=45:4.1.9.11.28&idno=45#se45.5.2540_1100). In general, AmeriCorps members may not perform any services that would result in a paid employee losing a job or a failure to hire a paid employee (including partial reduction of hours) or that would displace a volunteer. AmeriCorps member roles may not infringe on an employee’s ability to be promoted, and may not perform activities that would otherwise be performed by an employee as part of the assigned duties.

This can be a challenging requirement to understand. The best way to assess if your proposed design will displace or supplant someone is to ask yourself what would the organization do in the absence of AmeriCorps members? If your organization is already able to provide the services you are proposing using some other means (employees or volunteers), then you are likely proposing a design that would involve displacement. In these cases, you may consider how an AmeriCorps member’s role would be *substantially different* from an employee or volunteer’s role or what additional services a member could perform that would supplement the employee or volunteer’s role.

***Prohibited Activities***

The full list of AmeriCorps Prohibited Activities can be found in [45 CFR 2520.65.](https://www.law.cornell.edu/cfr/text/45/2520.65) The prohibited activities are an essential list that all grantees must be very familiar with and ensure compliance with for both AmeriCorps members and staff paid using AmeriCorps funds or match.

***Member Supervision***

AmeriCorps members may not supervise other AmeriCorps members. They may serve in a team leader role, providing guidance and support, but they may not formally or informally supervise another AmeriCorps member. It’s important to understand this as you develop your program design and consider who the formal supervisor for the members will be.