

CORONAVIRUS (COVID-19) FREQUENTLY ASKED QUESTIONS

Research and Evaluation (and SIF) Questions

Last update 8/21/20

AmeriCorps is closely monitoring the latest developments related to COVID-19. As America responds to the COVID-19 pandemic, you may have concerns about the potential impacts on your program. The below FAQs address questions posed by the outbreak. Check back as they are updated regularly.

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 AmeriCorps' statute and regulations for applicable requirements.

Information for Research Grantees:

1. As an AmeriCorps research grantee, what do I do if my work plan changes due to cancelations at the university and community events?

If you are a 2015 or 2017 National Service and Civic Engagement Research Grantee or a 2018 Community Conversations Research Grantee and your work plans will be affected due to public health concerns associated with COVID-19, please contact your AmeriCorps Program Officer by email with specific information regarding your situation and anticipated impacts.

[updated 3/13]

2. As a 2017 National Service and Civic Engagement Research Grantee completing the third year of a grant, can we apply for a no-cost extension if my work plan changes due to cancelations at the university and at other organizations associated with my research?

If you are a 2017 National Service and Civic Engagement Research third-year grantee you are able to request up to a one-year, no cost extension. Please contact your AmeriCorps Program Officer by email with specific information regarding your situation and anticipated impacts.

[updated per 2 C.F.R. § 200.308(d)(2)]

3. Will Community Conversations funding for the 2018 cohort awarded in FY19 carry forward into FY21?

If you are unable to utilize all of the funding you received in FY19, please have your authorized representative and project director provide your program officer and grants officer with a rationale and the amount you want to carry forward into year three. No cost extensions and carrying funds forward require prior written approval subject to 2 C.F.R. 200.308(d)(2) and (d)(3).

[updated 5/12]



Information for Social Innovation Fund (SIF) Grantees:

1. As a AmeriCorps Social Innovation Fund 2015 or 2016 grantee, what do I do as the Program Lead if implementation of my awarded application, subgrantee work plan, or approved evaluation study design and communication plan is impacted due to COVID-19 public health concerns?

If you are a 2015 or 2016 Social Innovation Fund grantee and your funded and approved application work plans will be affected due to public health concerns associated with COVID-19, please contact your AmeriCorps Program Officer by email with specific information regarding your situation and anticipated impacts. **[updated 3/13]**

2. We are sharing our expectations with our SIF subgrantees, specifically related to time reporting. In terms of verification of the time and activities performed, we're looking at options to validate claimed hours when subgrantees are unable to complete normal business practices. It is our understanding that our subgrantee staff are working remotely, however some of their existing grants management processes are a bit ill-suited for teleworking. For those that may not have an electronic timekeeping system or typically use hard copy timesheets, would an email from a staff person to their supervisor, noting the dates and time spent on SIF activities – with a subsequent email from the supervisor “approving” be sufficient documentation?

Yes, Uniform Guidance 2 CFR 200.430 does not require time sheets, just the recording of time for a specific employee with percentage breakdown on all activities, both Federally funded and non-Federally funded, and the assurance that it is accurate, allowable, and properly allocated. This allows for you and your subawards to have some flexibility on how exactly how you will document timekeeping and chargeable activity information.

Grantees and subgrantees should follow their internal policies for timekeeping and verifying timesheets when an employee is not available to sign their timesheet. If a policy is not in place, there are alternative ways to create those records. Employees who are teleworking may submit alternative written submissions to their supervisor noting hours they have served. Rather than using a timesheet, their submissions may be sent, for example, via email. The supervisor may, in turn, approve each submission by sending a response back to the employee with a notation such as “Hours submitted approved”. In addition to the emailed information and approvals themselves, both you as the Grantee and the subawards should document the temporary change in timekeeping practices in an internal memo kept for their records and yours.

Uniform Guidance:

2 CFR 200.430(h)(8)(i) requires non-Federal entities to maintain records that “accurately reflect the work performed.” These records must:



- Be supported by a system of internal control which provides reasonable assurance that the time being charged is accurate, allowable, and properly allocated
- Are incorporated in the official records, such as payroll records
- Reasonably reflect the employee's total activity
- Provide a time or percentage breakdown on all activities, both Federally funded and non-Federally funded, for the employee
- Comply with the non-Federal entity's pre-established accounting practices and procedures
- As stated at 2 CFR 200.430(h)(8)(i), non-Federal entities that cannot meet the aforementioned conditions may be required to submit personnel activity reports.

[updated 6/29]

3. Can SIF grantees be given a no-cost extension due to COVID-19? Can our deadline to draw down federal funds and report by our closeout date would be extended?

This question has two parts. Recipients can request a no-cost extension pursuant 2 C.F.R. § 200.308(d)(2). Further, funds that were obligated within their period of availability are available to liquidate obligations for a period of five years after the date of expiration. See 31 U.S.C. § 1552(a). Thus, grantees can draw down on the funds for five years, at which point the account will close and the funds will be cancelled. SIF cohort 2015 and 2016 grantees were not given continuation funding, and therefore are operating on only one five-year funding strip. For a SIF grantee this means that funds that are not spent and drawn down by the conclusion of this five-year period will be automatically recovered by the U.S. Treasury and that you and your team will be unable to draw them down from the Payment Management System (PMS). A no-cost extension would not change this. **[updated 4/2]**

4. Our SIF award is in the final program year, and we are beginning to closeout our subgrantees. Could we extend our SIF subawards to continue serving the participants and draw on federal funds (if matching funds are available)?

Per 2 CFR 200.308, if your subawards have not closed out yet, you can extend your remaining SIF subgrantee agreements, as long as your own internal SIF policies and guidance supports granting a no-cost extension. However, you cannot extend them past the current period of performance end date of your federal award. You need to inform your PO of the extension in writing, but it does not require the PO's approval. **[updated 4/2]**

5. During this COVID-19 national emergency most subgrantees are physically closed and serving clients remotely, which could have an impact on their ability to spend funds. What guidance can be given to subgrantees on expanded ways to perform during the national emergency. Are there creative ways AmeriCorps and AmeriCorps Seniors grantees are performing during this time to support subgrantees?

Creating guidance for subgrantees on reasonable, allowable, and allocable chargeable programmatic activities that are within your awarded scope of work during the COVID-19 national emergency is a good way to codify the impact and expectations and ensure fidelity



to your model. Each SIF award is unique in the intervention type, model, and approved evaluation plan. Think about chargeable activities that could be programmed in an online platform:

- Build on the work that is typically presented face-to-face by investigating options for moving to telephonic, email, or Facetime formats.
- Discuss with your subgrantees the wrap-around services needed to help meet the requirements of their enrolled participants.
- As you discuss community needs with your subgrantees, look into creating online webinars to share key community information with enrolled participants in a neighborhood format.

If, as a grantee, you are seeking to make changes to just the format/presentation of the programming rather than the scope of the awarded programming, your programming policies and guidance should include the context in which you are making the changes, how they are within scope, and the estimated timing and circumstances in which you revert to previous standard operating procedures.

If you are considering making a change to the scope of your awarded grant, you must submit a request to AmeriCorps in writing for review and approval before acting. **[updated 4/15]**

6. We are in the data collection stage of our approved SIF evaluation plan. Our approved plan will need to have some research activities modified due to COVID-19 community closures that will affect the volume and quality of data as well as potentially impact the research conclusions. What should we do as a grantee?

Per the SIF Evaluation Guidance Update Memo (dated 8/29/2017): Changes to evaluation design will no longer require review and approval. Grantees should include a section in the final report that outlines changes to the approved evaluation design (SEP) and justification for why it was necessary. Completing steps 1-5 below will ensure that both your organization and AmeriCorps has COVID-19 specific documentation on potential changes to your research deliverable:

1. Assess the impact on your approved SEP;
2. Develop options and a mitigation strategy with your External Evaluator and Subgrantees;
3. Inform your Program Officer and document the impact with a written COVID-19 plan;
4. Seek input from the AmeriCorps Office of Research and Evaluation; and
5. Please keep your Program Officer up-to-date on the further evaluation changes due to COVID-19.

[updated 4/15]



7. As a 2015 SIF cohort Grantee, all of our planned convenings and conferences for the dissemination and sharing of evaluation results have been canceled or rescheduled for the fall/end of 2020 after our award period of performance ends. Is it possible to extend our grant given the impact on performance due to COVID-19?

SIF cohort 2015 awards CANNOT be extended because the funding appropriated for such awards is subject to cancellation under 31 U.S.C. § 1552(a). As a 2015 SIF Grantee, your U.S. Treasury funding strip will expire at the end of July 2020. Dissemination of your evaluation results is a bona fide chargeable activity associated with the completion of your award. Please reach out to your Grants Officer and Program Officer for assistance with paying and documenting cancellation expenditures associated with dissemination events that can no longer be held during your awarded period of performance. For SIF grantees funded in 2016 and later, however, where legally possible AmeriCorps can adjust the period of performance for the grant funded convening and conferences, pursuant to 2 C.F.R. §§ 200.308(d)(2) and .308(d)(3). Please submit any such request to your Grants Officer and copy your Program Officer. **[updated 6/29]**

8. If our employees cannot report to work or telework because of COVID-19, are their salaries and benefits an eligible cost?

Yes, under certain conditions, it is allowable to continue to pay staff members their hourly pay or salaries under the grant. If a grant recipient's policies allow the grantee to continue to charge staff hourly pay or salaries during a period when no work is performed due to unexpected or extraordinary circumstances, then such charges to the grant award are allowable through September 30, 2020. The grantee's policy must allow the grantee to continue to charge wages and salaries regardless of the funding source, including Federal and non-Federal sources. These pay policies must also be applicable to the grant recipient's entire workforce.

Originally, this pay action was valid for a 90-day period consistent with the March 19, 2020 memorandum issued by the Office of Management and Budget (OMB) that provides federal grant awarding agencies, such as AmeriCorps, the authority to provide short term administrative relief to grant recipients affected by the loss of operational capacity and increase costs due to COVID-19. The 90-day period expired on June 18, 2020. See OMB Memorandum M-20-26.

On June 18, 2020, OMB issued a follow-on memorandum extending AmeriCorps' authority to provide this short-term administrative relief, to September 30, 2020. See OMB Memorandum M-20-26.

As provided in the June 18, 2020 OMB memorandum, AmeriCorps is authorized, through September 30, 2020, to allow grant recipients to continue to charge salaries and benefits to active grant awards consistent with the grant recipient's policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources. Please note that under this continued pay flexibility, payroll costs paid with the Paycheck Protection Program (PPP)



loans or any other Federal CARES Act programs must not be also charged to current Federal awards as doing so would result in the Federal government's paying for the same expenditures twice.

Please also note that due to the limited funding resources under each federal award to achieve its specific public program goals, AmeriCorps and AmeriCorps Seniors grant recipients must first exhaust other available funding sources to sustain its workforce, and implement necessary steps to save overall operational costs (such as rent renegotiations) during this pandemic period, in order to preserve Federal funds for the ramp-up effort. See OMB Memorandum M-20-26.

AmeriCorps may also evaluate the grantee's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances based on subsequent progress reports and other communications with the grantee.

Finally, as required by 2 CFR § 200.302 Financial Management and 2 CFR § 200.333 Retention Requirement of Records, grant recipients are required to continue to maintain appropriate records and documentation to support the hourly pay or salary charges that it made against the grant. This complies with OMB's cost principle requirements that require grant recipients to maintain appropriate records and cost documentation to substantiate charging hourly pay or salaries or other project activity costs related to the interruption of operations or services. 2 CFR §§ 200.302, 200.333. **[updated 6/26]**

9. Some AmeriCorps programs have waived their award match requirements due to the impact of COVID-19 on the grantee organization and communities in which the grantees are funded. Will AmeriCorps waive the Social Innovation Fund (SIF) award match requirement due to COVID-19?

SIF Grantees may seek a reduction in match under the SIF Match Reduction Policy and Process Memorandum (*"Match Reduction Policy" dated 10/1/2014*). The Match Reduction Policy states that per 42 U.S.C. § 12653k(i)(3) "[t]he Corporation may reduce by 50 percent the matching funds required by paragraph (1) for an eligible entity serving a community that the eligible entity can demonstrate is significantly philanthropically underserved."

This definition is applied on a community-by-community basis, not to the overall Grantee portfolio. That said, it is possible that a place-based Grantee's entire portfolio could be located in one community. A significantly philanthropically underserved community is defined as:

- (a) considerably less than the average number of active philanthropic institutions or investments, or
- (b) a community can become significantly philanthropically underserved if it is affected by an unexpected natural or man-made event that redirects or otherwise reduces the availability of match funds (e.g. disaster, loss of major local employer, etc.).



The *Match Reduction Policy* requires eligible, individual SIF Grantees to make a REQUEST in writing to receive a match waiver from AmeriCorps. The SIF Grantee must state in the request:

- The circumstances for the match reduction request
- The timeframe for the reduction
- The amount of the reduction requested, and
- Demonstrate in a plan, how the approval will allow them to substantively contribute to their or their subgrantee's efforts as defined by their approved work plans and agreements
- The Grantee should also describe the expected impact on their programming if the request is denied.

SIF Grantees in cohorts 2016 seeking a match reduction must apply to their Grants Officer and copy their Program Officer to receive a review and potential approval of their application. Those receiving match reductions will be instructed on how to create an amendment associated with the approved amounts. **[updated 6/9]**

10. Can a SIF award recipient use funds from a Paycheck Protection Program (PPP) loan as the SIF match requirement?

No, 42 U.S.C. § 12653k(k)(2) states that matching funds are required by law to be non-federal cash, therefore federal PPP funds cannot be used for the SIF match. **[updated 6/9]**

11. Our SIF subgrantees have shared their challenges in completing sustainability activities due to the disruption caused by COVID-19. A no-cost extension would respond to these challenges by providing the ability to extend our subgrantees' grant terms using solely match funds. Given these circumstances alongside the core SIF principle of sustainability, can we apply for a no-cost extension consistent with those parameters established in 2 C.F.R. 200.308(d)(2)?

There are several factors to consider in order to answer this question:

- a. The SIF was no longer appropriated by Congress starting in FY 2018. AmeriCorps allowed SIF Grantees with awarded multi-year grants and active periods of performance to continue their awarded and operationalized plans through no later than December 31, 2020.
- b. 2015 Cohort and 2016 Cohort SIF Terms and Conditions (dated 10/1/2018) were updated to state, "*Pursuant to 2 C.F.R. 200.308(d)(2)(i), AmeriCorps specifically prohibits SIF Classic and SIF Pay for Success grantees from initiating a one-time extension of the performance periods of their grant awards and will not approve any requests for an extension of the performance period of the SIF Classic and SIF Pay for Success grants.*"
- c. Each of the 2015 and 2016 Cohort SIF Grantees' Funds were obligated within their period of availability and are available to liquidate obligations for a period of five years [See 31 U.S.C. § 1552(a)] at which point the funds will be cancelled.

AmeriCorps would like to be as flexible as possible in our administrative relief efforts, but there are costs and risks associated with our agency's oversight of SIF awards that involve federal



programmatic and grants officer monitoring and oversight, risk management and mitigation, and evaluation support work.

Due to extraordinary circumstances, AmeriCorps will allow a SIF Grantee to REQUEST a time-limited, no cost extension for 2016 cohorts, if the following conditions are met:

- The grantee or subgrantee are spending only budgeted Match Funds per their currently approved budget.
- An Intermediary and/or subgrantee extension was needed to meet a SIF statute component of scaling, sustainability, or evaluation.
- The quantifiable time needed (no greater than 6 months) for the extension could be defined and subgrantee agreement work plans associated with that time show the need reinforced by community delays associated with COVID-19.
- The amendment required to provide the no cost extension will document the delays, the complete execution and draw of federal funds prior to the end of the current period of performance, and the needed reason.
- The request is a one-time exception, include documentation that the need is COVID-19 related, and must be approved by your Grants and Program Officer through a formal amendment in eGrants.

[updated 6/29]