

PROGRAM DIRECTOR'S GUIDE



AmeriCorps
Montana



AUGUST 2024

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Disclaimer

Guidance from AmeriCorps changes often and at irregular intervals. This AmeriCorps Montana Program Director's Guide is updated annually in August and is current as of the date of publication. The Governor's Office of Community Service (GOCS) also communicates all pertinent guidance changes from AmeriCorps the agency to AmeriCorps Montana programs as they occur. If you are not sure if something has changed since this guide was published, please reach out to your GOCS grant contact.

Change Log

Date	Change Description
8/1/2024	Added disclaimer language, pg ii.
8/1/2024	Edited for conciseness throughout.
8/1/2024	Updated external links throughout.
8/1/2024	Updated references to AmeriCorps Hotline to have consistent name throughout.
8/1/2024	Removed references to Silver Scholars throughout.
8/1/2024	Added language recognizing AmeriCorps' final rule, effective October 1, 2024, pgs 18 and 43.
8/1/2024	Added census, election, and polling activities to list of Prohibited Activities, pg 11.
8/1/2024	Added requirement that photos be submitted with progress reports, pg 12.
8/1/2024	Clarified reporting extensions will generally be granted 2 weeks at a time, pg 12.
8/1/2024	Added process for amending member position descriptions, pg. 20.
8/1/2024	Added note about AmeriCorps' intent to switch to single NSCHC vendor, pg 23.
8/1/2024	Clarified Slot Conversion procedure and added information about changing slots of enrolled members, pgs 32 and 33.
8/1/2024	Clarified requirements and added context throughout Chapter Five: Fiscal Management.
8/1/2024	Added note about updates to Uniform Guidance, 2 CFR part 200, effective October 1, 2024, pgs 40 and 43.
8/1/2024	Added information on the Payment Integrity Information Act & Sampling, pg 45.
8/1/2024	Added information about Management Decisions issued by GOCS in response to subrecipient audits, pg 46.
8/1/2024	Updated required trainings and expectations around those trainings throughout Chapter 6: Training & Technical Assistance.

Chapter One

Introduction, History & Structure

Introduction

The Governor's Office of Community Service (GOCS), aka ServeMontana, provides this guide to assist AmeriCorps program staff navigate AmeriCorps program requirements. It is a resource for program staff to maintain sound operations in compliance with federal and state statutes, regulations, and policies. This guide does not supersede requirements established by the Corporation for National and Community Service dba AmeriCorps, AmeriCorps Terms and Conditions, the subaward agreement with the State of Montana, or requirements applicable to federal grants, such as [2 CFR 200](#) Uniform Grant Guidance.

This guide does not include all legal requirements of managing an AmeriCorps grant, nor does it constitute AmeriCorps' official interpretation of the law, regulations, and policies related to AmeriCorps.

A Brief History of National Service

The United States has always relied on the action of engaged citizens. The Corporation for National and Community Service (CNCS), dba AmeriCorps, advances the ethic of civic engagement by providing opportunities for Americans to improve communities through service while learning and growing.

<https://americorps.gov/about>

The Civilian Conservation Corps, 1930s

During the Great Depression, President Franklin D. Roosevelt created the Civilian Conservation Corps (CCC). 4 million young people joined, restoring national parks, revitalizing the economy, and supporting their families. For 11 years the CCC provided billions of dollars in service and allowed millions of families to live in dignity. <https://www.history.com/topics/great-depression/civilian-conservation-corps>

The GI Bill aka the Servicemen's Readjustment Act of 1944

The GI Bill linked wartime service to education benefits, offering some WWII veterans the opportunity to pursue higher education in partial compensation for their service. With the education they received, those veterans sparked the economic boom that helped make America the world's leading economy in the 20th century.

Peace Corps, 1960s

President John F. Kennedy's inaugural address issued a call to service by challenging Americans to "ask not what your country can do for you, ask what you can do for your country." JFK went on to create the Peace Corps, which engages thousands of people into international service annually. After service, Returned Peace Corps Volunteers put their experience and knowledge to work at home.

<https://www.peacecorps.gov/>

The War on Poverty, 1960s-70s

President Lyndon B. Johnson brought the spirit of the Peace Corps home to America by creating Volunteers in Service to America (VISTA). VISTA, now part of AmeriCorps, funds projects under the Domestic and Volunteer Service Act of 1973. VISTA projects are sponsored by public agencies and

nonprofit organizations which place service members to improve the condition of people living in underserved, low-income communities throughout the U.S. and Indian Nations. Other initiatives such as Retired and Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), and Senior Companion Program (SCP) were also developed to engage older Americans in service.

Revival of Interest in National and Community Service, 1980s-90s

President George H. W. Bush sparked a revival in national service when he instituted the White House Office of National Service. Congress passed the 1990 National and Community Service Act, which created a Commission on National and Community Service whose mission was to “renew the ethic of civic responsibility in the United States.” Full implementation began in 1992, when the Commission awarded \$64 million in grants to support community service, including here in Montana!

Initiatives included Learn and Serve programs involving youth in service and service-learning in school and community activities; Higher Education Innovative Projects involving college students in service and promoting service at educational institutions; American Conservation and Youth Service Corps, supporting summer and year-round youth corps initiatives to engage in- and out-of-school youth in service; and the National and Community Service Demonstration Models, for programs that were potential models for large-scale National Service. The National Civilian Community Corps (NCCC) was enacted later as part of the 1993 Defense Authorization Act. NCCC is a residential service program modeled on the Depression-era Civilian Conservation Corps and the U.S. military that continues today.

National and Community Service Trust Act, 1993

President Bill Clinton signed the National and Community Service Trust Act into law in 1993, creating a new federal agency, CNCS, to administer National Service resources. The law created AmeriCorps, which was designed to support local, state, and national organizations. CNCS took over management of two previous agencies, ACTION, which was responsible for running VISTA and the National Senior Service Corps, and the more recent Commission on National and Community Service, including NCCC, forming the network of National Service we see today.

USA Freedom Corps, 2001

President George W. Bush continued the legacy of bipartisan support by calling on all Americans to serve their country for two years and announced the USA Freedom Corps, an umbrella network for volunteerism. A coordinating council housed at the White House and chaired by the President expanded and strengthened federal service programs like Peace Corps, Citizen Corps, AmeriCorps, and Senior Corps, with a goal to raise awareness and break down barriers to service opportunities within all federal government agencies.

The Serve America Act, 2009

President Barack Obama signed the Edward M. Kennedy Serve America Act. The Serve America Act reauthorized and expanded National Service administered by CNCS by amending the National and Community Service Act of 1990 and the Domestic Volunteer Service Act of 1973.

<https://www.americorps.gov/about/agency-overview/statutes-regulations>

AmeriCorps Rebranding, 2021

CNCS adopted the AmeriCorps name to increase awareness of all opportunities to serve and establish a firmer presence across the country.

Organizational Structure

AmeriCorps operates in a decentralized manner that places significant administrative responsibility on states and nonprofits.

Regional Offices

Regional AmeriCorps offices partner with State Commissions and administer AmeriCorps National, VISTA, and Seniors programs. Montana is in the Mountain Region, based in Denver and supported by a Senior Portfolio Manager and three Portfolio Managers. The Senior Portfolio Manager serves as an ex-officio member on the Montana Commission on Community Service.

<https://americorps.gov/contact/region-offices>

AmeriCorps Support offices

AmeriCorps Office	AmeriCorps Support Functions
Office of Regional Operations	Oversees programmatic aspects of grants and awards. Portfolio Managers serve as primary liaisons with state service commissions & national program grantees.
Office of Grant Administration	Oversees financial aspects of grants and awards.
Office of Monitoring	Oversees monitoring of AmeriCorps direct grantees, including state commissions.
Office of Research and Evaluation	Manages research and evaluation efforts and sets guidelines around evaluation.
National Service Trust	Manages the Education Awards for AmeriCorps members.
Communications and Marketing	Oversees media relations, marketing, and publications, including the online recruitment website. Provides marketing and branding information to the field.
General Counsel	Provides legal counsel for AmeriCorps and can answer legal questions related to AmeriCorps program management.
Office of the Inspector General (OIG)	Detects and enforces instances of waste, fraud, abuse, and violations of law of AmeriCorps and its funded programs. http://www.americorpsig.gov/

Montana Commission on Community Service www.serve.mt.gov

Since 1994, state service commissions have administered AmeriCorps State and community volunteer programs. The National and Community Service Trust Act created state service commissions in 1993. The nation's 52 commissions operate at state and local levels, granting hundreds of millions of funds each year. Grantees match federal dollars with state and local resources to support service and volunteerism. Combined, these funds support tens of thousands of AmeriCorps members nationwide each year. See <https://www.americorps.gov/contact/state-service-commissions>

The Montana Community Service Act established the Montana Commission on Community Service, a diverse, non-partisan, governor-appointed body representing a broad cross-section of service interests and statewide leadership. Under the advisement of the Governor and Director, the Commission supports GOCS, a state agency funded by AmeriCorps grants and the State of Montana.

The Governor's Office of Community Service strengthens civic engagement by:

- Encouraging Montanans of all backgrounds to engage in national service and community volunteerism.
- Calling young people to serve for the benefit of communities, landscapes, and people, improving their success through literacy, job skills, and interpersonal skills.
- Building on the existing organizational framework of state and local government entities to expand full and part-time service opportunities for all, particularly youth and older Montanans.
- Involving participants in activities that would not otherwise be performed by employed workers.
- Establishing programs to accomplish diverse, meaningful service that leads to improvements for residents and public places across Montana.

The Montana Commission convenes for four regularly scheduled meetings. Program staff are strongly encouraged to attend and provide public comments. Participation in Commission meetings raises awareness with Commissioners of your AmeriCorps program(s), the work you do, and facilitates future engagement opportunities. Please email serve@mt.gov with opportunities for Commissioners to attend program and AmeriCorps member events and projects, and GOCS will coordinate Commissioner attendance.

State Education Agencies - Montana Office of Public Instruction <http://opi.mt.gov/>

Serve America, a program created under the National and Community Service Act of 1990, was reformed by the National and Community Service Trust Act of 1993 into Learn and Serve America (LSA). LSA was reauthorized by the 2009 Edward M. Kennedy Serve America Act. While still authorized in the Serve America Act, in 2011 the U.S. House Appropriations Committee eliminated the budget for LSA. Until 2011, the Montana Office of Public Instruction received and administered LSA funds. The Montana Commission on Community Service reserves a seat for a representative of the State Education Agency.

Active AmeriCorps Streams of Service

AmeriCorps currently supports national service at national, state, and local levels:

<https://serve.mt.gov/ameriCorps/ameriCorps-programs>

- AmeriCorps programs: members serve with local and national organizations to meet community needs and, upon successful completion, receive Education Awards or cash stipends, depending on the stream of service. AmeriCorps is subdivided into three streams: AmeriCorps State & National (ASN), VISTA and NCCC.
- AmeriCorps Seniors: Americans 55 and older contribute skills and experience to their peers, elementary school students and the community (RSVP, Foster Grandparents and Senior Companions).

AmeriCorps State

State Service Commissions administer a significant portion of the AmeriCorps programs' budget via grants to eligible public and nonprofit organizations that sponsor national service programs. Grants assist these entities in recruiting, training, and placing AmeriCorps members to meet community needs.

- AmeriCorps State programs based outside of Montana but planning to or discovered to be operating in Montana are expected to consult with GOCS. If the program fails or refuses to consult with the Commission, GOCS may request information and communication regarding the program's activities in Montana from the State Service Commission responsible for that program.

AmeriCorps National Direct

Grantees, including public and nonprofit organizations, leverage program funds directly from ASN to provide service across multiple states. Grants assist these entities in recruiting, training, and placing AmeriCorps members to meet community needs.

AmeriCorps NCCC (National Civilian Community Corps)

Members serve in a 10-month, full-time residential program operated directly by AmeriCorps. NCCC combines the best practices of civilian service with those of military service, including leadership development and teambuilding. Members age 17-24 live and train at campuses in Denver, CO; Sacramento, CA; Vicksburg, MS; and Vinton, IA. Teams deploy from the campuses to provide direct service in their region, conducting projects in partnership with local and state sponsors. FEMA Corps, at the Vicksburg campus, focuses on disaster response. <https://americorps.gov/partner/how-it-works/americorps-nccc>

AmeriCorps VISTA (Volunteers In Service To America)

Members serve income-eligible communities and families across the country for one calendar year. VISTA members live in the communities they serve with local project sponsors, creating or expanding initiatives that can continue after they complete service. Their focus is indirect service, such as building capacity, mobilizing resources, and increasing self-reliance.

National Direct Consultation

The Edward M. Kennedy Serve America Act requires that each applicant proposing a multi-state National Direct AmeriCorps program must consult the State Service Commission in each of the states where they intend to operate the proposed program. ASN clearly outlines this requirement in the Notice of Funding Opportunity (NOFO). **The Montana Commission expects all National Direct applicants (new, recompetes, and continuation) will fully engage in the *Coordination among State Commission & National Direct Applicants* section outlined in each year's AmeriCorps State and National NOFO at each stage of the Award.**

The Montana Commission uses the [National Direct Consultation Single Form](#), provided by America's Service Commissions (ASC), to create meaningful partnerships with National Direct grantees and address unmet community needs throughout the state. More information on Montana's Consultation Process can be found on our [National Direct Consultation webpage](#).

Through the National Direct consultation process, GOCS aims to:

- Understand and be familiar in the scope and impacts of National Direct programs in Montana.
- Connect National Direct programs to geographic areas with little or no National Service presence to meet needs identified in the Montana State Service Plan.
- Effectively use limited resources for cross-stream collaboration, member training, and other events that lead to positive member experiences and increased public awareness of AmeriCorps service in Montana.

National Directs placing members in Montana are expected to participate in the annual ServeMontana Symposium and communicate with the Commission to share information on site and member recruitment, training, National Days of Service and other relevant activities.

ASN asks each Commission to provide input on National Direct applicants proposing to place members in their state by selecting “support,” “neutral,” or “do not support,” along with associated comments. GOCS uses information provided through consultation to give input to ASN on funding decisions that may impact Montana, and to provide feedback and recommendations to the applicant.

Chapter Two

AmeriCorps State Grants & Requirements

AmeriCorps State grants initiate, improve, or expand the ability of an organization and community to provide service to address unmet environmental, educational, public safety (including disaster preparedness and response), and other needs. GOCS strives to connect AmeriCorps resources to meet the goals and objectives of the Montana State Service Plan. AmeriCorps has a dual mission, to meet community needs while developing service members in the areas of leadership and civic engagement.

This manual is to guide two streams of AmeriCorps State grant funding in Montana: **formula** (awarded at the state level), and **competitive** (awarded at the national level). Formula funding is based on an allocation, a population driven formula, and awarded to State Commissions to fund AmeriCorps programs. Competitive funding is awarded to Commissions, with all subrecipient funding determinations made by AmeriCorps. The determination as to whether an application is submitted at the competitive level or not is given to the state commission and is based on the strength of the application, organizational history, and other strategic grantmaking decisions. Whether it is a competitive or formula grant, awards are made for three years, with annual continuation applications. Each three-year cycle is referred to as a “recompete.” Any program completing their second three-year cycle under formula funding will be assessed and, in some cases, required to apply for competitive funds. When feasible, funds are available for planning grants, which have a one-year budget period for an organization to develop an AmeriCorps program. Planning grants do not have members or performance measures.

Basecamp

To support AmeriCorps State programs in Montana, GOCS maintains an online collaborative messaging and resource platform, Basecamp. Basecamp is referenced throughout this guide as a resource to find more information on specific topics <https://launchpad.37signals.com/signin>

Those with Basecamp access should review the Montana AmeriCorps Basecamp Guide for tips to use it successfully. Program staff should reach out to their GOCS point of contact to gain access to Basecamp.

Grant Funds and Activities

Grant Funds: AmeriCorps grants provide dollars, service positions (slots and Member Service Years) and Education Awards, but do not provide all funds needed to administer a program. ASN grants fund one of two types of cost reimbursement grants:

- *Line Item:* grant with a detailed budget. The subrecipient must expend and report on federal and grantee shares. A first-time successful applicant is required to match at 24% for the first three-year funding period. Starting in year four, the match requirement gradually increases each year according to [45 CFR 2521.60](#).
- *Fixed Amount:* grant with a budget consisting only of number of Member Service Years (MSY) and cost per MSY. The amounts are identified in the Notice of Funding Opportunity (NOFO) and with application instructions issued each year. There is no specific match requirement for fixed amount grants. While fixed amount grantees provide the resources needed to operate the

program, they are not required to track or report on the grantee share. Fixed amount grants do not cover all costs, and reimbursement is based on AmeriCorps member enrollment, service hours, and retention rates. For a subgrantee to access the whole award, 100% recruitment and retention must be achieved.

Learn about fixed amount grant administration: [AmeriCorps Fixed Amount Grant Guide](#).

Eligible Service Activities: 45 CFR 2520

To determine the eligibility of a service activity, decide whether it falls within AmeriCorps' Focus Areas: Disaster Services, Education, Environmental Stewardship, Healthy Futures, Economic Opportunity, and Veterans and Military Families. From there, it is the legal applicant's responsibility to demonstrate that one or more of the priority areas are met in a proposal and in service activities. Within each priority area, AmeriCorps members provide *direct service* and/or *capacity building* activities that initiate, improve, or expand the capacity of an organization and community to meet the needs of those it serves.

Direct service generally refers to activities that provide a visible, measurable benefit to an individual, a group, or a community. Some examples are:

- Mentoring young adults in schools and communities.
- Engaging in community clean-up projects, trail maintenance and winterization.
- Providing information to vulnerable populations, and access to justice.
- Providing information and/or services to an area affected by disaster.

Capacity building activities increase an organization's ability to deliver its mission and are included in, or consistent with, the approved grant application. Some examples are:

- Strengthening volunteer management and recruitment.
- Conducting outreach and securing resources in support of service activities that meet specific needs in the community.
- Helping build the infrastructure of the sponsoring organization.
- Developing collaborative relationships with organizations working to achieve similar goals such as nonprofits, faith-based organizations, foundations, local government, institutions of higher education and local education agencies.

Member Development Activities, 45 CFR 2520.50

No more than 20 percent of the aggregate of all AmeriCorps member hours in the program, as reflected in the member enrollments in the National Service Trust, may be spent on member education and training. Training opportunities may include but not limited to: ServeMontana Symposium, orientations, in-service training, Life After Service training and other member development activities as approved by the program, the service site, and GOCS. For more information on development activities, see Chapter Four: Member Management, subsection [Member Development](#).

Fundraising Rules for Members, 45 CFR 2520.40 and 2520.45

AmeriCorps permits limited member fundraising activities when resources are raised directly in support of the program's service activities. Member hours earned fundraising must be tracked on time sheets in a discrete category and may not exceed 10% of the agreed-upon term of service, as reflected in the member enrollment in the National Service Trust. Examples of allowable activities include but are not limited to:

- Seeking donations of books from companies and individuals for a program in which volunteers teach children to read.
- Writing a grant proposal to a foundation to secure resources to train community volunteers.
- Secure supplies and equipment from the community to enable volunteers to help build houses for low-income individuals.
- Securing financial resources to assist in launching or expanding a program that provides social services to the community and is delivered, in whole or in part, through the members of a community-based organization.
- Seeking donations from program alumni for service projects performed by current members.

AmeriCorps members may not raise funds for member living allowances or for an organization's general (as opposed to project) operating budget. They may not write grant applications to AmeriCorps or any other federal agency.

Fundraising Rules for Program Staff

Generally, program staff and members may not lead the organization's major fundraising efforts.

AmeriCorps policy permits limited fundraising activities by grant covered staff, as long as such activities:

- Provide immediate and direct support to a specific and direct service activity.
- Fall within the program's approved direct service objectives.
- Are not the primary activity of the program; and
- Do not involve more than 10% of any individual member's time.

Under the Uniform Guidance it is unallowable to directly charge the grant for costs such as "organized fundraising" or expenses incurred "solely to raise capital or obtain contributions." ([2 CFR 200.442](#)).

However, it is allowable to apply an appropriate amount of indirect funds to the preparation of bids, proposals, and applications on potential federal and non-federal awards. ([2 CFR 200.460](#)).

Examples of what grant-covered staff may do with federal grant funds:

- Develop and print materials such as brochures and annual reports to be used for educating the public, including potential board members, funders, community partners, and elected officials.
- Contact individuals and organizations (potential partners) who may assist in delivering services.
- Ask the board of directors and other volunteers to raise funds on their own time.
- Pay for a program evaluation to demonstrate the program's impact and effectiveness.
- Solicit community involvement with or in-kind support for the program—e.g., seek volunteers to help with a project and donations of building supplies for a construction project.
- Coordinate community involvement in a day of service and other direct service activities that may have a fundraising element.
- Include members of the public (*including funders and other community partners*) on a general mailing list for newsletters or brochures and other general interest publications. (*Publications paid for with AmeriCorps grant funds, federal or matching funds, should not solicit donations*).
- Include in a general-purpose newsletter a "wish list" of needed in-kind items.
- Invite members of the public, including funders, to make a site visit to the program.
- Seek advice from individuals with expertise who may be business or foundation staff regarding matters such as program development, training, and evaluation.

- Invite members of the public, funders, and other community partners to attend orientation, end of service ceremonies and other special events.
- Ask a local business to sponsor a recognition event for members or volunteers.

Program staff may not:

- Use AmeriCorps grant funds, including matching or other federal funds, to develop promotional materials solely targeted at prospective funders.
- Use AmeriCorps grant funds, including matching or other federal funds, to engage in a direct mail campaign to raise funds.
- Use AmeriCorps grant funds, including matching or other federal funds, to conduct capital campaigns or endowment drives.
- Hire a development consultant and charge fees to the AmeriCorps grant.
- Charge time spent by staff on fundraising to AmeriCorps or matching funds.

Ineligible Service Categories, Activities and Uses of Grant Funds

There are activities which grant funded staff and members may not participate in while on duty or perceived to be on duty. There are specific types of organizations whose mission may fit eligibility criteria but are prohibited from receiving AmeriCorps funding under federal law. This section is intended to provide an outline; for full descriptions of the topics in this section refer to AmeriCorps legislation.

Prohibited Activities [45 CFR 2520.65](#)

While charging time to the AmeriCorps program, accumulating service or training hours, or otherwise performing activities supported by the program or AmeriCorps, staff and members may not engage in the following activities:

- Attempting to influence legislation;
- Organizing or engaging in protests, petitions, boycotts, or strikes;
- Assisting, promoting, or deterring union organizing;
- Impairing existing contracts for services or collective bargaining agreements;
- Engaging in partisan political activities, or other activities designed to influence the outcome of an election to any public office;
- Participating in, or endorsing, events or activities that are likely to include advocacy for or against political parties, political platforms, political candidates, proposed legislation, or elected officials;
- Engaging in religious instruction, conducting worship services, providing instruction as part of a program that includes mandatory religious instruction or worship, constructing or operating facilities devoted to religious instruction or worship, maintaining facilities primarily or inherently devoted to religious instruction or worship, or engaging in any form of religious proselytization;
- Providing a direct benefit to—
 - A business organized for profit;
 - A labor union;
 - A partisan political organization;
 - A nonprofit organization that fails to comply with the restrictions contained in section 501(c)(3) of the Internal Revenue Code of 1986 except that nothing in this section shall be construed to prevent participants from engaging in advocacy activities undertaken at their own initiative; and

- e. An organization engaged in the religious activities described in paragraph (g) of this section, unless AmeriCorps assistance is not used to support those religious activities;
- i. Conducting a voter registration drive or using AmeriCorps funds to conduct a voter registration drive;
- j. Providing abortion services or referrals for receipt of such services; and
- k. Such other activities as AmeriCorps may prohibit.

Additionally, grant terms and conditions prohibit AmeriCorps members from engaging in census activities, and from providing services for election or polling locations.

AmeriCorps members may not engage in Prohibited Activities directly or indirectly by recruiting, training, or managing others for the primary purpose of engaging in one of the activities listed above. Individuals may exercise their rights as private citizens and may participate in the activities listed above on their initiative, on non-AmeriCorps time, and using non-AmeriCorps funds. Individuals should not wear the AmeriCorps logo while doing so.

- Prohibited Activities should be posted at program offices and all service locations. Programs should review Prohibited Activities with members and site supervisors.

Nonduplication and Nondisplacement [45 CFR 2540.100](#)

- Nonduplication— Assistance provided under National Service laws shall be used only for a program that does not duplicate, and is in addition to, an activity otherwise available in the locality of such program.
- Nondisplacement—An employer shall not displace an employee, position, or volunteer (other than a participant under the National Service laws), including partial displacement such as reduction in hours, wages, or employment benefits, as a result of the use by such employer of a participant in a program receiving assistance under National Service laws.
- Private Nonprofit—Assistance made available under National Service laws shall not be provided to a private nonprofit entity to conduct activities that are the same or substantially equivalent to activities provided by a State or local government agency that such entity resides.

Reporting Requirements

Program Progress Reporting <https://serve.mt.gov/ameriCorps/program-management>

Each AmeriCorps subrecipient is required to submit Program Progress Reports. Progress reports monitor performance measures, assess program strengths and challenges, and highlight unique program/member achievements as well as other reporting required by the ASN/GOCS. Programs submit progress reports at least biannually and planning grantees submit reports periodically.

Program Progress Reports are due to GOCS the 20th of the month after the end of the reporting period:

- Program start (September 1 or January 1) thru March 31, due April 20
- April 1 thru September 30, due October 20
- November 1 thru December 31, due as soon as possible but no later than January 20*

*applicable only to programs operating on the calendar year (January start)

Each reporting period is represented on a cumulative reporting form, which is resubmitted with new data included on each due date. Subrecipients must submit one or more photos, clearly answer all questions, state program impact, outline challenges, and identify measures to address challenges and/or comply with federal laws and regulations.

Fiscal Reports & Requirements

AmeriCorps grants come with a wide range of required components, particularly related to fiscal management. See [Chapter Five: Fiscal Management](#) for more information.

Reporting Extensions

Extension requests for program and financial reports should be made prior to the due date. If the requester does not specify a new desired due date, GOCS will grant extensions of up to two weeks at a time.

Recognition of AmeriCorps Support, Affiliation with the National AmeriCorps Network, and AmeriCorps Branding Guidelines

Affiliation

AmeriCorps General Grant Terms & Conditions state the grantee must identify the program as an AmeriCorps program and all national service members as AmeriCorps members. “AmeriCorps” does not need to be in the program name, but the program must identify itself and its service locations as associated with AmeriCorps. <https://www.americorps.gov/grantees-sponsors/manage-your-grant>

AmeriCorps Branding and Logos

Subrecipients must comply with approved AmeriCorps branding and messaging outlined in the Terms and Conditions. Noncompliance may result in corrective action or disallowed costs.

Programs are strongly encouraged to place signs that include the AmeriCorps name and logo at service sites and use the slogan “AmeriCorps Serving Here.” During introductions and public speaking opportunities, AmeriCorps participants must be identified as AmeriCorps members *serving*.

The AmeriCorps Montana logo should be used whenever and wherever appropriate. Branding guidance and logos are located on the AmeriCorps Montana Basecamp, via the AmeriCorps MT Resources, under Branding, Marketing, & Logos. Contact GOCS Communications Staff for support.

<https://3.basecamp.com/3624101/buckets/28888657/vaults/5315346726>

To maintain uniform AmeriCorps identity, written permission is required prior to:

- Using the AmeriCorps name or logo on materials that will be sold;
- Using the AmeriCorps name or logo on clothing *not* worn by members or alumni;
- Altering the AmeriCorps logo; or
- Allowing a donor to use the AmeriCorps name or logo in promotional material.

Service Gear

Programs must prominently display the AmeriCorps logo on all service gear, such as clothing and public materials. These visual representations of the program and AmeriCorps must follow branding guidelines.

- Approved AmeriCorps gear: <http://www.nationalservicegear.org/>
- Good Deed Organization: <http://gooddeed.org/>

Promotional items

- Order promotional items and publications: <https://promote.americorps.gov/>
- National Service Photos: <https://www.flickr.com/photos/nationalservicephotos/>

In addition to AmeriCorps publications (handbooks, manuals, recruitment, and marketing materials), subrecipients often develop their own materials. The AmeriCorps Montana logo shall be included on publications related to an award of AmeriCorps assistance or resources. An acknowledgement and disclaimer shall be displayed on all reports and other published materials based upon work supported by the award. The acknowledgement and disclaimer may contain language the same as or similar to:

“This material is based upon work supported by AmeriCorps under Grant No(s) []. Opinions or points of view expressed in this document are those of the authors and do not necessarily reflect the official position of, or a position that is endorsed by, AmeriCorps.”

Except for safety gear, grantees may only charge the cost of member service gear to the federal share if it includes the AmeriCorps logo. Safety gear may be charged to the federal share, regardless if it includes the AmeriCorps logo. Any nonbranded service gear must be purchased with non-grant funds.

In addition to AmeriCorps service gear, there are other ways the affiliation may be achieved:

- Participants should appropriately describe AmeriCorps service. Members and the community should know they are AmeriCorps members *serving*, not workers or volunteers.
- Signs should identify sites as AmeriCorps service sites/service locations/host sites.
- Program staff, site supervisors, and members should be prepared to discuss AmeriCorps with stakeholders and members of the public.
- Stationery, brochures, newsletters, etc. should identify the program as AmeriCorps and include the AmeriCorps Montana logo.
- Press releases and other public materials should acknowledge the program as part of the AmeriCorps National Service network.

Disability Inclusion & Accommodation

All AmeriCorps subrecipients are urged to recruit members with diverse backgrounds who are qualified to contribute their unique skills and experiences to the program and the community. Programs and service activities must be accessible to people with disabilities, and subrecipients must provide reasonable accommodation for known mental or physical disabilities of otherwise qualified members, service recipients, applicants, and program staff.

- In all cases, member selection must be based on the applicant’s qualifications and whether they can perform the essential service activities, with or without reasonable accommodation.
- All selections and project assignments must be made without regard to the need to provide reasonable accommodation. Subrecipients should not enroll individuals who are unqualified or who pose a direct threat to the health or safety of others that cannot be eliminated through reasonable accommodation, nor is a program required to make accommodations that are unduly

burdensome or that will alter the program design fundamentally. However, all determinations must be documented.

Talk to the person first. Find out what functional limitations exist and what essential functions need to be accomplished, or what barrier exists to participation in the program or activity. Once an individual discloses a disability and requests an accommodation, evaluate the organizations capacity to provide the accommodation. In many cases individuals will know what they need and how to secure it.

When an individual discloses a disability and requests an accommodation that involves getting or modifying equipment, or structural changes, subrecipients are strongly encouraged to use technical assistance resources. There are knowledgeable resources available to assist you and the individual in evaluating appropriate and effective accommodations. Cost-effective and practical reasonable accommodations can often be identified and implemented.

- ServeMontana: <https://serve.mt.gov/ameri corps/reasonable-accommodation-resources>
- Job Accommodation Network (JAN) is an available, no cost resource 800-526-7234 <http://askjan.org/>
- Independent Living Centers (ILCs) are federally funded and exist nationwide to provide assistance: <http://www.ilru.org/projects/cil-net/cil-center-and-association-directory-results/MT>

Providing Accommodations: Financial and Administrative Burden

Under the Rehabilitation Act, grant Terms & Conditions, and the agreement with GOCS, your organization must provide accommodation upon request by a qualified individual with disabilities, unless doing so is an undue financial or administrative burden. This is a high standard, and being difficult to achieve, time-consuming, or costly do not meet this standard. There are many factors that go into evaluating the obligation to provide accommodations.

Undue administrative burden means the accommodation will alter the fundamental nature of the program. For example, adjustment of hours is often a form of reasonable accommodation. However, you must carefully consider the circumstances and legal requirements when adjusting hours for participants. AmeriCorps State subrecipients have statutory requirements regarding service hours, and changes to hours that violate these requirements alter the fundamental nature of the program. Therefore, these changes are not required for reasonable accommodation and providing them may violate AmeriCorps statutes.

Determine if your program has consistently applied these requirements to all participants. Strict adherence to the legal requirements to deny a person an accommodation for their disability when flexibility is allowed for others is discrimination. If consistently applied, the following scenarios would alter the fundamental nature of the program:

1. A full-time AmeriCorps member who is not required to serve 1700 (or a higher minimum established by the program);
2. An AmeriCorps member who extends the time within which to complete the requisite number of hours. NOTE: There are ways to work around a fundamental alteration in the 12-month completion requirement. If a person with a disability needs time off for extensive medical treatments, hospitalization, etc., or is unable to serve full time for a period, options are:
 - Place on a non-disciplinary suspension for the period, with that time added to the end of the current service term. This allows the person to complete the full-service term and

obtain the Education Award. It makes no difference if this puts their completion date after the end of the grant cycle. However, the participant cannot receive a living allowance during a period of suspension.

- There may be circumstances under which they can be converted to part-time status. This is dependent on program design and may affect the individual's member benefits.
- Release for compelling personal circumstances. This allows them to receive a prorated Education Award.

Undue financial burden

Is a determination based on many factors, including the overall size of the organization (not just the AmeriCorps program) – number of employees and participants; number and type of facilities; and size of budget.

- The organization's design, including the composition and structure of your entire organization's workforce and service force.
- The nature and cost of the accommodation needed.

In all cases, if you fail to provide a reasonable accommodation when requested by a qualified individual with disabilities and claim undue burden, the onus is on you to justify the undue burden.

In some cases, funds may be available from AmeriCorps and/or GOCS to help pay for accommodations by reimbursement. If available, funds may not be used to meet basic accessibility and accommodation requirements but are prioritized for the program to be more accessible than the minimum requirements to provide reasonable accommodation. If providing an accommodation would be an undue financial burden for your organization, funds may be available on a case-by-case basis, contact GOCS.

GOCS Diversity, Equity, and Inclusion (DEI) Statement

In 2020, the Commission approved this statement with the intention to promote diversity, equity, and inclusion among the GOCS office and AmeriCorps State in Montana. This statement may be adapted and adopted by AmeriCorps programs in Montana if they so choose:

The Governor's Office of Community Service, also known as ServeMontana, affords individuals the opportunity to reach their fullest potential by recognizing, respecting, and engaging the unique backgrounds, experiences, and perspectives they bring to national service and community volunteerism in Montana.

GOCS Inclusion & Accommodation Assessment - <https://serve.mt.gov/amerikorps/reasonable-accommodation-resources>

In the spring GOCS issues the AmeriCorps Inclusion & Accommodation Assessment, an anonymous survey. The goal is for all active members to respond. Results of the Assessment are compiled and presented to the Montana Commission at each June meeting and are posted on the GOCS website.

Chapter Three

Before a Member Starts: Records, Recruitment, NSCHC, Enrollment

Member Records

Several records must be documented and retained by the program before AmeriCorps members begin service. Records may be stored electronically pursuant to all requirements of the Terms and Conditions for the given year, the contract with GOCS, and Sections 1703 and 1705 of the [Government Paperwork Elimination Act](#). For more details on records management and electronic signatures, see the Terms and Conditions. Subrecipient recordkeeping policies and procedures should incorporate AmeriCorps requirements.

Grant records must be kept of each members' application, documentation of eligibility, service agreement, time sheets, performance reviews, enrollment and exit forms, and documentation of National Service Criminal History Checks (NSCHC) in compliance with the contract with GOCS and AmeriCorps Grant Terms & Conditions. These items are discussed further in this chapter.

In alignment with [HIPAA](#) and to safeguard Personally Identifiable Information, member medical documentation received by the program must be stored in a separate, secure location and only accessible to personnel for whom it is necessary.

Additional required documentation that should be stored separately from the member file includes documentation of childcare eligibility, tax forms, and components of the NSCHC.

Supervisors and program staff should conduct periodic internal reviews of member files and time sheets to ensure service descriptions are allowable, hours are accurately tracked, and member files are current, complete, and compliant.

Member Eligibility [45 C.F.R. 2522.200](#)

AmeriCorps subrecipients are not required to retain documentation verifying identity and citizenship status of selected applicants, however the program must document their review. When an individual accepts the invitation to enroll into a service opportunity, the process to verify the citizenship status and social security number by the Social Security Administration (SSA) is initiated. Typically, verification is completed within three days and the member's status in the Portal will be indicated as "verified."

- In some instances, the member's identity cannot be automatically verified by the SSA and must be manually verified. Manual verification should be initiated upon discovery, so the start date is not delayed. Contact the [AmeriCorps Hotline](#) for further instructions on manual verification. Social Security cards should be signed by the cardholder.

High School Diploma and Self-Certification

To be eligible for AmeriCorps service, an individual must have a high school diploma or equivalent, or:

- Did not drop out of secondary school to enroll as an AmeriCorps participant and must agree to obtain a high school diploma or its equivalent prior to using the Education Award; or
- Obtain a waiver from AmeriCorps based on an independent evaluation secured by the program demonstrating the individual is not capable of obtaining a high school diploma or its equivalent; or
- Be enrolled in an institution of higher education on an ability to benefit basis and be considered eligible for funds under section 484 of the Higher Education Act of 1965 ([20 U.S.C. 1091](#));
- For tutoring programs ([42 U.S.C 12572](#))
 - The applicant must have obtained a high school diploma unless the tutoring services are through a structured, school-managed cross-grade tutoring program

Members must certify their high school status to enroll in the My AmeriCorps portal, which fulfills the program's requirement to obtain and maintain documentation from the member relating to their high school education. If the member is incapable of obtaining a high school diploma or its equivalent, as determined by an independent evaluation, the subrecipient must retain a copy of the supporting evaluation.

Programs must provide support services to help members without a high school diploma or equivalent achieve one. Members must have their high school diploma or equivalent, or obtain a waiver, to access the Education Award. For programs that include the attainment of high school equivalency as a purpose and include GED classes during the program year, attaining a high school diploma or equivalent may be a requirement of successful completion of the term of service.

Terms of Service

The term of service must be stated in a member service agreement. There are two definitions which must be followed regarding the term of service:

1. Full-time term of service is defined as 1,700 hours of service during a period of up to one year
2. Half-time term of service is defined as 900 hours of service during a period of up to one year

Upon enrollment, eGrants sets a default end date of exactly one year from the start date. There are no specific guidelines on the amount of time which a member must be allowed to complete a less than halftime term, however regulations state a program must "ensure each member has sufficient opportunity to complete the required number of hours for the Education Award." AmeriCorps grant Terms and Conditions further state "[in] planning for the member's term of service, the [sub]recipient must account for holidays and other time off and must provide each member with sufficient opportunity to make up missed hours."

An exception to Term of Service rules is allowed if a member is serving in an approved National Service Position directly related to disaster response. In this case they may extend their term for up to 90 days. During this extended service period, the program is permitted to continue offering that member a living allowance and other benefits; however, the value of the member's Education Award will not change.

Member Start and End Dates

Start and end dates must fall within the start and end dates of the subaward contract issued by GOCS, typically within a 12-month period. Members cannot serve beyond the contract end date unless special

circumstances arise where the contract must be extended to allow members to complete service hours. This applies to all members – those receiving a living allowance and those not receiving one.

Extending a grant beyond the contracted end date is a “no-cost extension” and must be requested from GOCS at least 30 days before the end of the contract. No-cost extensions are reserved for situations where a member needs additional time to complete their term of service. Extending a contract requires GOCS approval, may result in adjusting required reporting dates and will likely create additional reporting requirements for the program. AmeriCorps guidance around no-cost extensions may change annually, contact GOCS for more information.

Number of Education Awards

Individuals are eligible to receive the equivalent of two full-time Education Awards.

Serving Multiple Terms

As of May 2024, AmeriCorps announced a [Final Rule](#) that would change the term limits for AmeriCorps State and National members. While the new Final Rule will go into effect October 1, 2024, AmeriCorps has not yet released the implementation plan as of the publication of this document. The information below refers instead to term limits prior to October 2024.

The Edward M. Kennedy [Serve America Act Final Rule](#) (published August 20, 2010) increased the limit of terms one may serve in AmeriCorps State and National from two to four terms with added limits stating no individual may receive more than the aggregate value of two full-time Education Awards regardless of the stream of service through which the member earns the Award.

The following guidance is provided by AmeriCorps: Although the *amount* of a full-time award may change, the *value* of a full-time award will always be equal to 1.

- For example, an individual who completed a half-time position approved in 2009 received an education award of \$2,362.50. The value of this award is the amount received, \$2,362.50, divided by \$4,725, the amount of a full-time award in the year the position was approved, or .5.
 - Another individual completes a half-time position approved in 2010 and receives an Ed Award of \$2,675. The value of this award is the amount received, \$2,675, divided by \$5,350, the amount of a full-time award in the year the position was approved, or .5.

Using this calculation, the value of an award received for half-time service term will always be equal to .5. If an individual exits a term of service for compelling personal circumstances and receives a pro-rated award, the value attributed to that award will be based on the amount actually received.

- For example, an individual released for compelling personal circumstances from a full-time position approved in 2009 after serving 800 hours and received a pro-rated award of \$2,223.52. The value of this award is the amount of the award received, \$2,223.52, divided by, \$4,725, the amount of a full-time award in the year the position was approved, or .47.

Exhaustion of the number of terms one may serve in AmeriCorps State and National would not necessarily prevent an individual from enrolling in a position in another National Service program, such as AmeriCorps NCCC or VISTA.

AmeriCorps National Service Network	Maximum Number of Terms within each type of AmeriCorps Program
AmeriCorps State & National	4
AmeriCorps NCCC	No limit terms; members may NOT serve more than two consecutive NCCC terms without a break of at least 10 months before serving again
AmeriCorps VISTA	5

For further guidance, read the limitation section or contact GOCS,
<https://americorps.gov/members-volunteers/segal-ameri-corps-education-award>

eGrants Member Portal

Most technical member and grant management tasks are completed in eGrants, which also serves as the repository for applications coming through the my.AmeriCorps.gov website. eGrants questions and error messages should first be directed to the AmeriCorps Hotline and secondarily to GOCS.

- Member timekeeping records are not a function of the AmeriCorps portal. All AmeriCorps State grantees must establish a member time management system outside of the portal that tracks hour categories and is used consistently.
- AmeriCorps Hotline: <https://americorps.gov/contact> or 800-942-2677.
 - A history of submitted hotline tickets can be located at:
https://questions.americorps.gov/app/utlis/login_form/redirect/account%252Fquestions%252Flist/session/L3RpbWUvMTY3ODI5Mjc3MS9zaWQvcjFTOVV6MXE=

Member Service Agreements and Position Descriptions

The Member Service Agreement (MSA) outlines responsibilities, terms, conditions, and benefits as an AmeriCorps member in a specific program. The minimum required components of a MSA are stated in the AmeriCorps State & National Terms & Conditions. Members must sign their MSA no later than the first day of service.

At a minimum, as described in the [AmeriCorps Grant Terms & Conditions](#), the MSA must contain:

- Member position description stating the member service activities including performance criteria. It is the grantee's responsibility to ensure member positions "do not include or put the AmeriCorps member in a situation where the member is at risk for engaging in any prohibited activity ([45 CFR 2520.65](#)).” See the next section below for more details.
- Member term of service, including the minimum number of hours the member must serve to complete the term and the time span a member must complete the service hours.
- The value of the Ed Award the member will receive upon successful completion of service.
- Standards of Conduct describing how the member is expected to behave under the specific circumstances of their service; this may include dress code and appropriate use of language.
- Prohibited Activities
- Nonduplication and Nondisplacement language
- Member fundraising requirements
- Drug Free Workplace Act requirements
- Civil rights requirements, complaint procedures, and rights of beneficiaries.
- Suspension and Termination Rules ([45 CFR 2522.230](#)) *see more on page 36

- Circumstances under which a member may be released, including release for cause or compelling personal circumstance, suspended service, reinstatement and release prior to serving 15% of the term.
- Grievance Procedures, including Grievance procedures in the Member Service Agreement ensures the member receives the procedure and signs acknowledging the receipt and review of the document.
- Other requirements by Grantee, which may include additional requirements necessary for the member to complete their term of service and receive the Ed Award. Examples might include attendance at service events and trainings, or a minimum number of volunteers recruited.

Member Position Descriptions

Each grantee must provide an accurate and complete position description for each member position, including meaningful service activities and appropriate performance criteria.

Grantees are responsible for ensuring positions do not put AmeriCorps members in a situation where they may be at risk for engaging in any prohibited activity, or being perceived as engaging in any prohibited activity ([45 CFR 2520.65](#)), an activity that would violate the non-duplication and non-displacement requirements ([45 CFR 2540.100](#)), or exceed limitations on allowable fundraising (45 CFR 2520.40 through 2520.45).

- ✓ The recipient must accurately and completely describe the activities to be performed by each member in a position description.
- ✓ Position descriptions must be provided to AmeriCorps and GOCS upon request.
- ✓ The recipient must ensure each member has sufficient opportunity to complete the required number of hours to qualify for an Ed Award.
- ✓ In planning for the member's term of service, the recipient must account for holidays and other time off and must provide each member with sufficient opportunity to make up missed hours.

AmeriCorps sets the standard on member position descriptions through annual Terms and Conditions and other resources:

- ✓ https://americorps.gov/sites/default/files/document/Member-Position-Description-Outline_2023-01_508.pdf

Certain words, even if accurate in describing a member's service, may be construed as an unallowable activity and should be avoided in position descriptions and service listings.

- For example, the word "advocate" is defined as *one that defends or maintains a cause or proposal*. However, in National Service the word is interpreted to mean: *to conduct activities aimed at influencing public officials*. The definition of the actual word may be an allowable activity; however, the interpretation of the word is unallowable.
- Similarly, the phrase "other duties as assigned" should be avoided.

If a member's service activities change during the term of service to include approved activities not listed in the position description, the position description should be amended to reflect the change. Changes in member activities are only appropriate if the new service activities are allowable and align with the program design.

- Be sure the member and their host site supervisor have had the opportunity to review the amended position description.

- If the position description is included in the Member Service Agreement (MSA), obtain updated signatures as appropriate (member, host site supervisor, program staff).
- If the position description is separate from the MSA, and the program's practice is to obtain signatures on the position description, obtain updated signatures on the amended position description as appropriate.
- Save the original and the updated position descriptions to the member file, and the effective date should be clearly stated in any amended documentation.

AmeriCorps Recruitment

Each program must have a written recruitment plan outlining the practical strategy for local and national recruitment. Recruitment plans include position descriptions for members and site supervisors, a list of target audiences who are well-suited for service, and ways to advertise available positions.

AmeriCorps & GOCS expect programs to recruit from all pools: national, state, and local communities. Diversity is important and can be represented in many ways: age, gender, economic status, educational background, race and ethnicity, skills, physical abilities, and others.

Recruitment Resources:

Montana resources can be found on the [GOCS Program Management webpage](#) and on the [AmeriCorps Montana Basecamp](#), including the AmeriCorps Montana Recruitment Roundup, flyers, and more.

Additional resources can be found on the AmeriCorps State Subgrantee Resources page drop down menu under "Recruit Members." <https://americorps.gov/grantees-sponsors/state-subgrantees>

National Recruitment Website <https://my.americorps.gov/>

My AmeriCorps is the web-based system for recruitment, selection and placement of AmeriCorps members. The system allows individuals to learn about all AmeriCorps service opportunities, filter opportunities based on selected criteria, and apply online. Program staff list each service opportunity, receive applications and select applicants. Using My AmeriCorps, staff can reach out to potential applicants.

My AmeriCorps is intended to generate interest in serving in AmeriCorps, simplify the application process, and increase customer service to program staff and applicants. To access the system, an authorized program staff accesses eGrants. The recruitment and member management system side of eGrants is referred to as 'the Portal'.

- New to AmeriCorps? Create an eGrants account to post opportunities, search for potential applicants, contact applicants, review applications, and select members.
<https://egrants.cns.gov/espan/main/login.jsp>
- A procedure is in place for applicants without internet access to become users by means of contract staff available via the toll-free number 800-942-2677.

Applying to Serve

The My AmeriCorps system is the preferred way to apply to service opportunities.

- If an applicant cannot use the My AmeriCorps system, a paper form may be acceptable and, if approved, subrecipient staff may complete the official enrollment.
- If requested, subrecipients must make forms available in alternative formats.

Programs must list all member listings/position descriptions by creating Service Opportunity Listings in the My AmeriCorps Portal, per the AmeriCorps State and National Grant Terms and Conditions.

- Process: Subrecipients submit member recruitment listings for each service opportunity through the My AmeriCorps portal. If the listings are compliant, they are approved and posted. If the listing is not compliant, it may be returned with the requested changes.

AmeriCorps & Handshake

The AmeriCorps Centralized Recruitment Unit (CRU) engaged the recruiting platform Handshake to host a nationwide premium account. Individual programs can engage the AmeriCorps premium account in a variety of ways, and Montana programs that have done so have seen applicants as a result. See the [ASN Handshake Memo 10.25.22 on Basecamp](#) for details. To set up a Handshake account that is affiliated with the AmeriCorps premium account, see the [AmeriCorps Handshake Handbook](#) in Basecamp.

National Service Criminal History Checks (NSCHC)

[42 U.S.C. 12645g](#) as supplemented by [45 2540.200](#). See current [NSCHC compliance requirements here](#).

The Serve America Act of 2009 as amended sets the requirements for NSCHC. All grant covered individuals (AmeriCorps members, program staff and all others that appear on the programs application budget that are funded either by match or federal funds) are subject to NSCHC.

NSCHC is not a background check; it is a series of steps that must be taken before a selected candidate may start work or service. *NSCHC should be referred to as such, not as a background check.*

Fixed Amount grants have no submitted budget, so staff on these awards are not subject to NSCHC.

All subrecipients **must** complete the NSCHC e-course annually per the ASN Terms & Conditions. GOCS requires a minimum of two staff from each program, who have a role in completing the NSCHC or are backup to primary staff, to take the e-course annually. Submit current certificates of completion to serve@mt.gov.

- <https://americorpsonlinecourses.litmos.com/course/325500>

AmeriCorps prioritizes NSCHC compliance and sets the expectation NSCHCs are “On Time, Every Time.” To ensure the timing and elements of the law are followed, program staff should refer to AmeriCorps resources to stay current on compliance requirements. Visit the link below to access the most up to date NSCHC guidance, including the NSCHC Manual.

- <https://www.americorps.gov/grantees-sponsors/history-check>

All components of the NSCHC must be conducted, reviewed, and an eligibility determination made *before* a person begins to work or serve in a grant-covered position.

All programs must have a policy/procedure for conducting NSCHC. Use the [Recommendations for Effective NSCHC Policies and Procedures](#) document to ensure your policy/procedure include all compliance requirements.

Montana State Specific Policies

While all Montana AmeriCorps programs are expected to use AmeriCorps NSCHC resources to stay compliant, there are also state-specific policies:

- **Simple Log:** GOCS requires all AmeriCorps State programs use the Simple Log to document NSCHC activities for grant covered individuals. This log may be requested by AmeriCorps and GOCS at any time and should be kept up to date as checks are completed. Individuals required to undergo NSCHC should be represented on the log, and it should include individuals who completed portions of the NSCHC but withdrew from participation prior to enrollment. For second term members, input the original dates of their checks and note their break in service was less than 180 days. See the Instructions tab in the Simple Log for more information.

The Simple Log is an Excel file and can be downloaded from the General Information and Guidance section of the [GOCS website](#) or the [AmeriCorps Montana Basecamp](#).

- **AmeriCorps approved vendors are the only vendors to be used in Montana for NSCHCs.** *As of July 2024, AmeriCorps indicated intent to switch to one single NSCHC vendor, Truescreen, before the end of the 2024 calendar year. Guidance on conducting NSCHC through the single vendor has not yet been released.*
 - Currently, Fieldprint is the only approved FBI channeler and Truescreen is the only AmeriCorps approved vendor for conducting the NSOPW and State checks. It is highly recommended subrecipients in Montana use these approved vendors for NSCHC for all required individuals.
 - **AmeriCorps NSCHC Vendor Mapping:** GOCS requires all Montana AmeriCorps State programs to be mapped (i.e. connected) to GOCS's vendor accounts for monitoring. Organizations that operate a National Direct and an AmeriCorps State program must maintain a separate account for the AmeriCorps State program, and only AmeriCorps State projects are to be mapped to GOCS's vendor accounts.
- **Noncompliance Self-Report:** Please conduct internal reviews of member files, particularly NSCHC. If member ineligibility or noncompliance is discovered, make a self-report to GOCS and bring into compliance as soon as possible.
- **NSCHC Record retention:** The AmeriCorps approved vendors, Fieldprint and Truescreen, and (if applicable) the Montana Department of Justice (MTDOJ), and GOCS each have different record retention schedules. Contact GOCS with questions and always retain all results of the NSCHC per the subaward agreement (8 years after the end of the agreement).
- **NSCHC Montana Best Practice:** GOCS strongly recommends all subrecipients rerun the NSOPW annually for staff and retain each year of search results.

- **Suitability:** Suitability is determined by grant recipients, subrecipients, or service sites. An individual may be eligible to work or serve in a position under NSCHC regulation but may not be suitable for a position based on criteria that the grant recipient, subrecipient, or service site establishes. Suitability criteria must be consistent with state and federal Civil Rights and nondiscrimination laws, including Titles VI and VII of the Civil Rights Act of 1964 (and AmeriCorps' implementing regulations under Title VI). Additional screening criteria should be clearly described and adhered to within grant recipient, subrecipient, or service site policy. Due to the limited nature of the results provided by Fieldprint and Truescreen, programs may run checks beyond the NSCHC to get a more complete understanding of criminal history an applicant may have. See the [NSCHC Manual](#) for more information.

Member Enrollment

To access member enrollment resources, visit <https://americorps.gov/grantees-sponsors/state-subgrantees>. Under Resources, select Enroll Members from the dropdown menu.

Member Pre-Enrollment

For each applicant, certain “pre-enrollment” steps must be completed. If not completed, member start dates may be delayed.

1. All members must have a verified citizenship status and valid Social Security Number (SSN) verified by the Social Security Administration via eGrants or must be manually verified *on or before* the members start date. If SSN or Citizenship verification is “returned” and manual verification is required, contact the AmeriCorps Hotline (1-800-942-2677) for next steps.
 - ASN and VISTA members who required manual verification previously will require manual verification if re-enrolling in another term of service.

Tip: Select the applicant for service in eGrants as soon as a verbal offer has been accepted, and ensure the applicant accepts the position offer in the My AmeriCorps Portal. This will initiate the SSN and Citizenship verification processes.

2. NSCHC (NSOPW, State, *and* FBI fingerprint checks) must be completed and adjudicated *before* the member start date.
 - In the NSCHC Certification Field, enter the date on which the NSCHC was completed and adjudicated. The date entered must be before the member’s start date and is not required for individuals who are under 18 as of their start date.

Enrolling Members

Individuals selected for service must be enrolled within 8 calendar days (including the start date) of their start date.

The following items must be in place prior to enrollment to avoid enrollment delays:

- Notice of Grant Award received
- Program year has begun
- Service locations set up in My AmeriCorps portal
- Correct slot types are available for all applicants being enrolled (see slot conversion section)

- Applicants' eligibility has been verified
- Applicants have completed their portion of the enrollment form and "accepted the invitation to service term," including acknowledgment of partial education award (if applicable).

Chapter Four

Member Management

Ethic of Service

The centerpiece of the AmeriCorps ethic is summed up in the motto “Getting Things Done.” The dual mission is to strengthen communities and develop members’ leadership skills and civic responsibility. To create an *esprit de corps* for members, programs are encouraged to plan member cohorts that begin and end service at or near the same time.

Orientation sessions for staff, site supervisors, and members should include discussion of the national scope of AmeriCorps, an explanation of how the program fits into the AmeriCorps network, and the Montana State Service Plan. Appropriate opening ceremonies, including issuing the AmeriCorps Pledge, are important for all members. Engaging community leaders and elected officials in such events is encouraged. Subrecipients should arrange for members to participate in cross-stream activities such as the ServeMontana Symposium, National Days of Service such as Martin Luther King, Jr. Day, and other development opportunities sponsored by GOCS or AmeriCorps.

Civic Reflection

To promote civic engagement and responsibility, GOCS requires programs present a minimum of 3 Civic Reflections during each program year. Civic reflections should align with the service lifecycle and take place at scheduled trainings like orientation, mid-year, and close of service.

Civic Reflection resources are available on the [ServeMontana website](#) and [Basecamp](#). Reach out to the GOCS Training Specialist for support facilitating civic reflections.

Member Development

Member Development Activities

A program may allocate no more than 20 percent of the aggregate required service hours to education and training ([45 CFR 2520.50](#)). *This rule applies to programs, not individual members. Each program should have a written policy on earning hours per category.*

Member Orientation

Programs must conduct an orientation for members designed to enhance member safety and sensitivity to the community.

Core topics for member orientation should include, at a minimum:

- National Service: the big picture, the dual mission of AmeriCorps, and how the program fits into Montana and the nationwide network of AmeriCorps service.
- An overview of the history and nationwide importance of National Service including:
 - ✓ The history of service in America
 - ✓ A discussion of the AmeriCorps ethic
 - ✓ The meaning of community – generally and in Montana
 - ✓ The doors of opportunity that will open through service
 - ✓ Responsibilities individuals have to themselves, the community, and the nation

- Information about the community or natural environment where the service will occur.
 - ✓ The community need the service addresses
 - ✓ Member safety
- Program rules & regulations (review member service agreement & program handbook)
 - ✓ Drug Free Workplace Act of 1988
 - ✓ Sexual harassment and other discrimination issues
 - ✓ Grievance procedure
 - ✓ Making up missed service hours
 - ✓ Prohibited Activities
 - ✓ Release: personal compelling, or for cause
 - ✓ Rules of conduct
 - ✓ Safety protocol
 - ✓ Suspension & Reinstatement
- Program operating policies
- Benefits including:
 - ✓ Living allowance
 - ✓ Introduction to education award & opportunity for qualified loan forbearance
 - ✓ Program objectives & how to collect data for performance measure and/or evaluation
 - ✓ Staff and member roles
 - ✓ Timekeeping
 - ✓ Training calendar
 - ✓ Travel and expense reimbursement policies
- How to Craft an Elevator Speech – Prepare members to succinctly present on:
 - ✓ AmeriCorps
 - ✓ The program/organization/host site
 - ✓ Their service term and activities
- Participation in a Civic Reflection

Programs are encouraged to use this [Crafting an Elevator Speech Activity](#) guide.

AmeriCorps Pledge

During orientation or another appropriate time, members should be asked to take the AmeriCorps pledge. Typically, the Pledge is issued to members by program staff, GOCS staff, a Commissioner, or an elected official, such as the Governor, Lieutenant Governor, a Tribal official or a local government official, such as a mayor. Members being inducted should stand, raise their right hand and repeat line by line, after the official.

*I will get things done for America—
to make our people safer, smarter, and healthier.
I will bring Americans together to strengthen our communities.*

*Faced with apathy, I will take action.
Faced with conflict, I will seek common ground.
Faced with adversity, I will persevere.
I will carry this commitment with me this year and beyond.
I am an AmeriCorps member, and I will get things done.*

Other Member Training Activities

Programs must provide members with training, skills, and knowledge to succeed in service.

Examples of training for assigned service activities:

- Skills training (mentoring, providing legal information, trail maintenance and construction, etc.)
- Recruiting, training, and retaining community volunteers
- Cultural awareness
- Team building
- Program and site-specific training

Examples of in-service and end of service member training:

- Communication and listening styles
- Accommodation of persons with disabilities
- Conflict resolution
- CPR/first aid
- Reflection activities
- Life After AmeriCorps, Using Ed Award, describing service on your résumé, & more!

National Days of Service

Throughout the year, AmeriCorps members are asked to lead and participate in National Days of Service. This provides the opportunity to serve alongside community volunteers, other AmeriCorps State members and members of other streams of National Service.

National Service days and other events include:

- Martin Luther King Jr. Day of Service (January)
- AmeriCorps Week (March) *attendance at the ServeMontana Symposium is required*
- Global Youth Service Day (April)
- 9/11 Day of Service and Remembrance (September)

Member Management

Site Supervision

Members must be supervised while on duty by a designated site supervisor who is available and responsive to the member, the program, and GOCS. Programs should provide training and maintain regular communication with all site supervisors. If a site supervisor is grant covered and is listed on a line item grant budget, they must consent to and undergo NSCHC.

Teleservice should be rare, and requires appropriate documentation, supervision, and oversight.

Teleservice is an arrangement where the member performs service duties from an alternative service site other than the location where the individual would typically serve. Teleservice does not refer to

service performed while on authorized travel status, or mobile service at designated sites as opposed to the active service location.

- [AmeriCorps State and National Teleservice Guidance](#)

In alignment with the ASN Teleservice Policy, GOCS requires each program to have a concise written policy regarding teleservice that addresses the following:

- When teleservice is reasonable;
- That advance written authorization from GOCS is required;
- Communication expectations of site supervisors and teleservice members;
- Time and attendance abuse mitigation strategies; and
- How appropriate supervision is implemented, including validation of the activities to be performed, and verification of hours claimed.

Written requests should be submitted to GOCS 10 business days in advance. GOCS will respond in writing to indicate approval or disapproval, and conditions as applicable.

Member Performance Reviews [45 CFR 2522.220](#)

At minimum, the grantee must conduct and keep a record of midterm and end-of-term written performance reviews for each full-time member, and an end-of-term written performance review for less than full-time members. The end-of-term performance review should address, at a minimum, the following:

- The number of hours the member has completed and whether this satisfies the term of service;
- Whether the member has satisfactorily completed assignments, tasks, or projects, making them eligible for the Ed Award; and
- Whether the member has met other performance criteria that were clearly communicated at the beginning of the term of service.

Under AmeriCorps regulations, end-of-term performance reviews are the key piece in determining a member's eligibility for additional terms of service. For this reason, all members, regardless of the status of their exit, must receive an end of term performance review.

- Applicants must disclose previous terms of service when applying for an AmeriCorps position, so the program can contact the applicant's former service program staff to request a reference and information on previous member performance reviews.

Member Safety

Under grant terms and conditions, subrecipients must have appropriate risk management to ensure the safety of AmeriCorps participants and community volunteers. Members may not participate in projects or undertake service activities that pose a significant safety risk. Subrecipients should establish appropriate policies related to supervision of members and provide specific training to minimize risks. While AmeriCorps members are not considered employees, they should be covered by worker's compensation, which is an allowable grant expense. Refer to the ASN Terms and Conditions and the MT Dept. of Labor & Industry: <http://erd.dli.mt.gov/work-comp-regulations>

Voting

Subrecipients should encourage all eligible members to vote and when appropriate allow members time to vote during scheduled service hours.

Member Service Location Transfer

Member transfers to a new service site require prior written approval from GOCS, are rare, and should only be completed in extreme circumstances for good reason. A Member Service Agreement amendment and any updates to the member's Position Description must be completed prior to hours being accrued at the new location.

In the event of an emergency, program staff should notify GOCS as soon as possible.

Member Release from Participation

A program may release members from participation for two reasons: (a) for compelling personal circumstances; and (b) for cause. See [45 CFR 2522.230](#) for requirements and [2 CFR 200.334](#) for record retention requirements.

Regardless of the situation under which a member is released, they must be exited in the eGrants system within 30 days and if they are receiving childcare benefits, the provider be notified immediately.

Files of members exited without an Education Award and those exited with partial Education Awards are typically selected for review during GOCS/AmeriCorps compliance monitoring.

Member Release for Compelling Personal Circumstance [45 CFR 2522.230](#)

This circumstance allows a member to end the term of service early and receive a prorated Education Award. There are two qualifications: (1) the member must have completed at least 15% of the term, and (2) must demonstrate a compelling personal circumstance.

- It is the member's duty to demonstrate the compelling personal circumstance and the AmeriCorps program's duty to determine if the member's reason for leaving is legitimately a compelling personal circumstance. For additional guidance on whether a release for compelling personal circumstance is warranted, contact GOCS.

Compelling personal circumstances are beyond the participant's control, and could include:

- A participant's disability or serious illness;
- Disability, serious illness, or death of a participant's family member if this makes completing a term unreasonably difficult or impossible; or
- Conditions attributable to the program or otherwise unforeseeable and beyond the member's control, like natural disaster, a strike, spouse relocation, or the nonrenewal/premature closing of a project or program, that make completing a term unreasonably difficult or impossible.
- Other circumstances AmeriCorps has, for public policy reasons, determined, including:
 - Military service obligations
 - Acceptance by a participant of an opportunity to make the transition from welfare to work
 - Acceptance of an employment opportunity by a participant serving in a program that includes employment among its participants in its approved objectives.

Compelling personal circumstances do not include leaving a program to enroll in school; to obtain employment, other than moving from welfare to work or leaving a program that includes in its approved objectives the promotion of employment among its participants; or because of dissatisfaction with the program.

[45 CFR 2522.230](#) (a)(6) As an alternative to releasing a participant, after determining that compelling personal circumstances exist, the program may suspend the participant's term of service for up to a year (or longer if approved by AmeriCorps based on extenuating circumstances) to allow the participant to complete service with the same or a similar AmeriCorps program at a later time. Approvals are granted on a case-by-case basis.

It is best practice for a program to receive or maintain documentation of a compelling personal circumstance (e.g. a statement from the member, doctor's note, etc.) but, it is necessary to document that the member was released for compelling personal circumstance (staff memo to file). It is recommended that programs maintain a policy on requirements for compelling personal circumstances, the policy is covered during orientation, and is included in the Member Service Agreement.

Member Release for Cause, [45 CFR 2522.230](#)

A release for cause includes any circumstances other than compelling personal circumstances that warrant an individual's release. These circumstances may include anything from disciplinary removals pursuant to the program's service agreement with the member, to the member's exit prior to completing service hours.

In alignment with the Drug-free Workplace Act of 1988, AmeriCorps subrecipients must release for cause any participant who is convicted of a felony for the sale or distribution of a controlled substance *during* a term of service. The program must notify GOCS within 10 days of the infraction, prior to the member's release.

What are the consequences of releasing a member for cause?

- The member will not receive any portion of the Education Award or any other payment from the National Service Trust, including loan forbearance.
- An individual who is released for cause must disclose this fact in any subsequent applications to participate in AmeriCorps. Failure to do so disqualifies the individual for another Ed Award.

No Automatic Disqualification if Released for Cause:

- A release for cause covers all circumstances in which a member does not successfully complete the term of service for reasons other than compelling personal circumstances. Therefore, it is possible for a member to receive a satisfactory performance review and be released for cause.
 - For example, a member who is released for cause from a first term to take a job offer would not be disqualified from enrolling for a subsequent term if the individual received a satisfactory performance review for the first period of service.
- In the exit form, program staff are asked if the member satisfactorily completed the requirements of service. If 'no' is indicated, the member will be disqualified for future terms of service.

Member Exit

To officially end service, whether a member has successfully completed the term of service or not, members and programs must complete the exit process:

- Members must exit themselves in the My AmeriCorps Portal. If a member does not exit themselves and cannot be reached, the program should complete a National Trust Exit form,

indicate the individual was not available to sign the form and add documentation demonstrating efforts to reach the member to the member file.

Programs must exit the member from eGrants within 30 days of the member's final hour served. Failure to comply with 30-day rule increases risk and may negatively impact program performance and future funding recommendations.

Members cannot use their Education Award until the exit process is complete. See "Education Award Usage (42 U.S.C. 12604)" under "AmeriCorps Member Benefits" for more information.

Replacing a Member - Slot Refill

Per the AmeriCorps State & National Terms & Conditions, except for recipients whose grant awards have special award conditions under [2 CFR 200.207](#) or [200.338](#), programs that have fully enrolled the awarded member positions are allowed to replace any member who terminates service before completing 30% of the term, provided the member who is terminated is not eligible for and does not receive a pro-rated Education Award. This is known as a "slot refill." A slot being refilled does not necessarily need to be replaced with the same slot type. If the program is 100% enrolled, a slot may be refilled. Refilled slots may be converted, see the next section.

Changes in Member Service Year Member Positions - Slot Conversions

As outlined in the AmeriCorps State & National Terms & Conditions, Commissions are allowed to approve slot conversions from the approved budget to a configuration that maximizes utilization of the awarded MSY, under certain circumstances. This allows unfilled AmeriCorps slots to be converted in accordance with the grant award, increasing the number of slots in the program within the awarded MSY. When converting a slot to one requiring fewer hours, the grantee is not limited to a one-for-one slot conversion and may increase the number of members accordingly. *However, the total number of MSY and Education Award amounts in the grant may not increase because of the slot conversion.*

All conversion requests must be Trust neutral (within the total Education Award amounts awarded to the grant), subject to availability of funds in the Trust and awarded MSY. Slot conversions may not leave .21 or greater MSY unassigned. Remaining MSY as a result of slot conversion may not be available later in the program year.

GOCS does not generally approve slot conversions unless applicant(s) have been identified to fill the converted slots and are within 1-3 weeks of their start date. Increasing the number of slots may negatively impact the programs enrollment rate, if the additional slots are not filled.

The GOCS slot conversion request procedure is as follows:

1. Program staff complete the slot conversion request template, available on the ServeMontana website and Basecamp. Submit the completed request to GOCS two weeks prior to the needed change.
2. GOCS will review and may request more information, such as a budget modification or assurance.
3. If not approved, no change.
4. If approved, GOCS will communicate approval for the program staff to proceed in the program's slot table by making the changes, validating then saving in eGrants.

5. If another slot conversion is requested, the program should use the most recent slot configuration to propose the next change, not the original slot configuration.
6. Follow the process. Unauthorized changes in eGrants may result in compliance findings or unintended loss of MSY.

The total MSY & Education Award amounts *may not increase* from the slot conversion.

Converting a Term of Service for an Enrolled Member

In very rare circumstances, programs may request to change an existing member's term type to a larger one (e.g., changing a member's term type from 1200 hours to 1700 hours). This type of change requires GOCS preapproval, and requests will be considered on a case-by-case basis. Programs must ensure the budget is adequate to support such a conversion before making the request.

Transferring Member Positions Between Grants

According to the grant terms and conditions, under very rare and specific circumstances, members and/or member positions may be transferred between subrecipients or programs. These transfers require GOCS and/or AmeriCorps approval, and are subject to the following rules and restrictions:

- State commissions may not transfer member positions *between* competitive and formula subrecipients.
- State Commissions may not transfer funds *among* competitive subrecipients.
- With restrictions, a Commission, parent organization, or regional Portfolio Manager may grant permission to transfer a member to another AmeriCorps State or AmeriCorps National program. A compelling personal circumstance must be provided to justify the transfer.
- As a general rule, members may not transfer across different streams of service (e.g., from AmeriCorps State or National to AmeriCorps VISTA).

Site Visits

AmeriCorps subrecipients are expected to visit active service locations at least annually, depending on program design or the need to address unforeseen circumstances. Program budgets should facilitate staff travel for site visits.

- Staff should document the visit and use a written method to conduct the visits, such as a site visit questionnaire. Site visit tools should include questions designed to prevent, detect, and if needed, enforce instances of noncompliance.
- Many programs include a meeting with the member and the site supervisor during the visit. Some meet with them separately and then together.

AmeriCorps subrecipients should expect onsite and/or remote compliance monitoring and oversight visits from GOCS and AmeriCorps. Grant monitoring is based on annual risk assessment determination and is not an audit. Oversight and monitoring allows GOCS/AmeriCorps staff to learn more about a programs service and training activities, community partnerships, compliance with AmeriCorps regulations, policies and grant provisions, progress toward meeting performance measures, best practices, and opportunities for technical assistance. All visits will be coordinated with organization leadership and program staff.

- GOCS Risk Assessment and monitoring tools <https://serve.mt.gov/ameriCorps/program-management>

Team Leaders

The National and Community Service Act, as amended, provides for approved National Service positions to include a “position involving service as a crew leader in a youth corps program or a similar position supporting a National Service program that receives an approved National Service position” 42 U.S.C 12573(6). This language allows programs, and youth corps, to use AmeriCorps members to provide an additional layer of member support and leadership under certain conditions. *Prohibited Activities apply to AmeriCorps Team Leaders just as they do to all grant covered individuals.*

Team Leaders are not permitted to act in a staff capacity or to supervise AmeriCorps members. Team Leaders must not be responsible for program development or coordination. They may assist by providing information and resources on best practices or by helping to develop portions of the program such as training events and curriculum. *Under no circumstances should an AmeriCorps member serving as a Team Leader be the individual legally responsible for the program or other AmeriCorps members.* A Team Leader position description should predominantly include activities that involve performing direct service and providing support to members engaged in direct service.

While Team Leaders are not to serve as the program’s administrative staff, they may be engaged on a limited basis in activities that support the administration of the AmeriCorps program. These include member recruitment and raising funds or in-kind contributions in direct support of specific AmeriCorps projects, such as service projects. See [45 CFR 2520.40](#) for detail regarding members and fundraising.

Examples of allowable Team Leader activities:

- Serving alongside members performing direct service, as a model and to provide assistance;
- Training members, providing guidance and support to members, including reflection exercises, conflict resolution, advice for transitioning out of AmeriCorps, etc.;
- Leading monthly/weekly meetings of members;
- Engaging with the community to develop partnerships, including community volunteers, that will support the members’ projects; and
- Communicating with program staff, site supervisors, and other members to ensure the execution of a quality program consistent with the AmeriCorps provisions.

Examples of unallowable Team Leader activities:

- Signing member time sheets;
- Accessing another member’s file;
- Managing payroll and budget;
- Evaluating member performance;
- Disciplining AmeriCorps members;
- Grant writing to AmeriCorps; and
- Enrolling/dismissing AmeriCorps members.

AmeriCorps Member Benefits

Living Allowance

The National and Community Service Act of 1990, as amended, and the Serve America Act, require AmeriCorps programs to provide full-time members with a living allowance. Each year AmeriCorps sets the minimum and maximum amount for member living allowance by slot type. AmeriCorps members are not employees (45 CFR 2510.20). As such the living allowance is not a wage and cannot be paid on an hourly basis. Programs must distribute the living allowance at regular intervals and in regular increments and may increase living allowance payments only on the basis of increased living expenses such as food,

housing, or transportation. Living allowance payments may only be made to a participant during their term of service and must cease when the participant concludes the term of service. Programs may not provide a lump sum payment to a participant who completes the originally agreed-upon term of service in a shorter period of time (45 CFR 2552.245).

Federal Benefit Programs

AmeriCorps members may be eligible for federal benefit programs such as Supplemental Nutrition Assistance Program (SNAP), Low Income Energy Assistance Program (LIEAP) and Temporary Assistance for Needy Families (TANF) based on income and existing assets. Eligibility for these programs is administered through the [Office of Public Assistance](#) in the Montana Department of Health and Human Services. Commission Staff continue to work with state and local agencies regarding the treatment of the member living allowance as income for purposes of determining eligibility for federal benefits programs. GOCS has developed slides for programs to use in informing members about federal benefit programs, which can be found [on the GOCS website](#), under “Training Resources.”

Health Care

Health care benefits must be made available to all full-time members and meet the standards established by the grant Terms and Conditions for the grant year. Health care benefits may be provided to members serving less than full time, but AmeriCorps funds may not be used to support the cost. An exception is made for less than full time members who are performing service on a normal full-time schedule for a period of six weeks or more. These members are eligible for health care benefits and ASN funds may be used. Dependent coverage is not an allowable grant expense. See the applicable AmeriCorps State & National Terms and Conditions here, <https://americorps.gov/grantees-sponsors/manage-your-grant>

Child Care

Members may be eligible to receive subsidized childcare through Gap Solutions while participating in National Service. For more information on childcare benefits, visit americorps.gov/members-volunteers/your-benefits/childcare or call 855-886-0687

Eligibility requirements for AmeriCorps Childcare benefits include:

- Must be an active member serving on a regular full-time schedule for at least six weeks.
- Member must need childcare services to participate in AmeriCorps.
- Member’s household income must not exceed the maximum amount under the Child Care & Development Fund Block Grant rules established by the state or territory in which the childcare services are provided.
- The member must be a custodial parent or legal guardian of a child under the age of 13.
- The child must be living with the member.
- Once the member is approved and accepts the AmeriCorps childcare benefit, the member must not receive a childcare benefit for the same child from any other source.

Programs may choose to provide childcare benefits to less than full-time members from non-AmeriCorps sources of funds. Less than full-time members may be eligible for childcare subsidies available through state-administered childcare assistance. Various state childcare programs are available to families who are on TANF, “at risk” of going on TANF, or losing TANF due to the AmeriCorps living allowance.

Additional Member Benefits

AmeriCorps encourages programs to provide additional member benefits. Some programs have requested to provide AmeriCorps members with an incentive payment or bonus. GOCS generally cautions against providing such payments. However, the practice is not strictly prohibited, so, if a program would like to provide an incentive payment or bonus to members:

- GOCS recommends that any such payments are not AmeriCorps or Grantee Share funds. However, if they are to be paid for with federal funds or are included as grantee match, then GOCS requires inclusion in the grant budget within the Other Operating Costs section.
- GOCS requires that the program develop and adhere to a written policy that outlines how the incentive payment or bonus is funded and distributed. The policy should include what conditions must be met to receive the payment.

Programs are also encouraged to work with host sites to provide non-cash benefits including assistance locating housing, provided lodging, gas cards, food donations, etc.

Eli Segal Education Award

The Serve America Act links the value of AmeriCorps Education Awards to the maximum value of the Pell Grant and therefore the amount changes annually. Ed Award amounts for each slot type are determined by the grant year the applicant was awarded. This may be different than the amount advertised on the AmeriCorps website. <https://americorps.gov/members-volunteers/segal-americorps-education-award>

<i>Term</i>	<i>Hours completed</i>
Full-time	at least 1700
Three Quarter Time	at least 1200
Half time	at least 900
Reduced half-time	at least 675
Quarter time	at least 450
Minimum time	at least 300

Requirements for Earning and Education Award [42 C.F.R. 2526](#)

The eligibility of a member to receive an Education Award is based on an end of term performance review that *must be completed by a direct supervisor of that member*. GOCS best practice is for the site supervisor and the member to sign the performance review. The end of term performance review must assess three basic points, which should also be spelled out in the member service agreement and position description. Has the member:

- Completed the required number of service hours for the term of service,
- satisfactorily performed on assignments, tasks, or projects, and
- met performance criteria as determined by the program and communicated to the member?

It is each program's responsibility to determine and certify members' eligibility for an Education Award. As such, the organization's grievance policies and procedures should contain language pertaining to a member who exits without an Education Award.

Forbearance

Individuals serving in an approved AmeriCorps position may be eligible to postpone repayment of qualified student loans through an action called loan forbearance. While a loan is in forbearance it continues to accrue interest; however, at successful completion of a term of service, the National Service Trust may pay all or a portion of the interest accrued on the loan.

- Requests for forbearance and student loan interest can be made online through the my.AmeriCorps.gov portal.

Education Award Usage [42 U.S.C. 12604](#)

The Education Award will become available for disbursement through My AmeriCorps Portal only after a member has completed a term of service and the exit has been certified by the program. (See “Member Exit” under “Member Management” for more information.) An individual has seven years from the end of service date to use the Ed Award. Not all schools and loans are eligible to receive Education Award payments. For eligible institutions see [42 U.S.C. 12604](#) or contact the National Service Trust.

<https://americorps.gov/members-volunteers/segal-americorps-education-award>

In general, the Education Award may be used:

- To repay qualified student loans (i.e. federally backed loans);
- To pay all or part of the cost of attendance at a qualified institution of higher education;
- To pay expenses incurred in participating in an approved school-to-work program;
- To pay expenses incurred in enrolling in an educational institution or training establishment that is approved under [38 U.S.C chapter 36](#) or other applicable provisions of law, for offering programs of education, apprenticeship, or on-job training for which educational assistance may be provided by the Secretary of Veterans Affairs; and
- To pay interest expenses in accordance with regulations.

After completing service, members are considered Alumni. Alumni may choose to split the Ed Award to pay a combination of any of the qualified educational expenses. The payment will be made directly to the school or loan holder designated by the individual.

Allowable Education Expenses [42 U.S.C. 12604\(c\)](#)

The Education Award can be used to pay current educational expenses at Title IV institutions of higher education (including graduate and professional programs), at the National Outdoor Leadership School (NOLS) and other unique training programs, and at qualified vocational schools. An institution is considered a Title IV school if it has an agreement with the U.S. Department of Education making its students eligible for at least one of the federally backed forms of financial assistance such as Pell Grants, Perkins Loans, Stafford Loans, National Direct Loans, and Federal Consolidated Loans.

The Education Award can also be used at a program of education approved by the Secretary of Veterans Affairs, including expenses incurred in enrolling in an educational institution or training establishment that is approved under the GI Bill. To make sure the institution is qualified, check with the financial aid office or the National Service Trust.

Education Award Matching

Montana Campus Compact member institutions match the Education Award at varying levels:

- <https://mtcompact.org/awards-scholarships/segal-americorps-education-award-and-match/>

Nationwide list of institutions matching the Education Award; some match one to one.

- <https://americorps.gov/partner/partnerships/schools-national-service-search>

Qualified Loans

National Service legislation defines *qualified student loans* as loans backed by the federal government under [Title IV of the Higher Education Act](#) (except PLUS Loans to parents of students), or under [Titles VII or VIII of the Public Health Service Act](#). Education Awards may be used to repay a student loan made by a state agency, including state institutions of higher education. Education Awards may not be used to repay any other type of loan, even if the loan was obtained for educational purposes. The Education Award may be used to repay *qualifying* defaulted student loans. For questions if a specific loan type is qualified, call the National Service Trust, 888-507-5962.

Interest Payments

Individuals who have successfully completed a term of service in AmeriCorps are eligible to have the Trust pay as much as 100% of the interest accrued on their qualified student loan during their service. The portion the Trust will pay is determined by the type of service (full or part-time) and the length of service term.

The Trust will not pay interest if the member failed to complete the term of service unless there is a compelling personal circumstance and the member earned a prorated award. An interest payment will only be made after successful completion of service and the individual has been provided the Ed Award.

Education Award Payments and Taxes

Interest payments and all payments made with the Education Award are considered by the IRS to be taxable income in the year in which the payment(s) are made. When and how much of the Ed Award is redeemed will likely impact the individual's overall income tax liability. The Trust DOES NOT deduct taxes from Education Awards or interest payments. If the Education Award and interest payments total more than \$599.00 in a calendar year, in January of the following year, AmeriCorps will issue a Form 1099 (miscellaneous income) to be used in income tax return preparation. The total sum of interest payments and Education Award payments are listed together on the 1099 form.

Since the Education Award is taxable, it is not a scholarship and should not be referred to as such.

<https://americorps.gov/members-volunteers/segal-americorps-education-award/find-out-more>

However, members may be eligible for other tax relief through the Taxpayer Relief Act of 1997.

For more information check the following resources:

- IRS <https://www.irs.gov/uac/about-publication-970> : IRS public contact: 800-829.-040.
- To request IRS Publication 970, Tax Benefits for Higher Education, call 800-TAX-FORM (800-829-3676) or by download it from the IRS website

Transferring an Education Award

Legislation passed in 2009 allows eligible AmeriCorps Alums who were age 55 or older at the start of their service term to transfer Segal AmeriCorps Education Awards to their eligible child, foster child, stepchild, grandchild, or step-grandchild. Learn more here: <https://americorps.gov/members-volunteers/segal-americorps-education-award/find-out-more>

Outside Employment

Outside employment is not a member benefit, however it is allowable at the program's discretion. The living allowance rate may influence an AmeriCorps member's inclination to seek outside employment. Outside employment must be at a location *other* than the AmeriCorps service site or any other project related organization where the AmeriCorps member serves, and must not interfere with successful completion of the term of AmeriCorps service.

Before accepting outside employment, the AmeriCorps member is expected to obtain approval of the site supervisor and program staff. It is best practice this approval be written and retained in the member file to ensure there is no conflict between the AmeriCorps service and the outside employment.

While in service, an AmeriCorps member may only accept outside employment for positions that:

- are part time;
- do not conflict with AmeriCorps service activities, regularly scheduled service, and AmeriCorps program requirements (including prohibited activities); and
- comply with all federal, state and local laws, and regulations.

Counsel members seeking outside employment to be aware of the implications of an increased income, including public benefits eligibility, income taxes and other tax issues, health benefit coverage, and any others. The impact is unique to each individual's personal situation, so the member should be encouraged to weigh outside employment carefully.

While outside employment is best addressed with the member, the service site, and the program, GOCS reserves the right to determine if an AmeriCorps member's outside employment is adversely impacting their service commitment.

Service Sites Hiring AmeriCorps Members

Montana AmeriCorps program staff work hard to recruit, select, and engage individuals into service with eligible organizations across the state. It is expected each program has a policy prohibiting service locations from hiring AmeriCorps members until after their term of service is completed and includes corrective action/consequence for those sites who do not comply.

- While GOCS encourages all organizations to sign on as an [Employer of National Service](#), the expectation is the active Term of Service will be honored.
- If a site is known to hire one or more AmeriCorps members before the term of service is complete, the site may be ineligible to host an AmeriCorps member or receive AmeriCorps service in the future.

Chapter Five

Fiscal Management

As of April 2024, the White House Office of Management and Budget announced [updates to 2 CFR part 200 \(Uniform Guidance\)](#) that will change some aspects of financial grants management. While the updates will go into effect October 1, 2024, AmeriCorps has not yet released its implementation plan as of the publication of this document. The information below refers instead to Uniform Guidance rules as implemented prior to October 2024.

The Notice of Grant Award and Terms & Conditions contain many details for governing and managing AmeriCorps grants. Programs must comply with all applicable federal laws, regulations, and the Uniform Guidance ([2 CFR Part 200](#)). The Uniform Guidance is cited in the Notice of Grant Award and Terms & Conditions, and addresses many (but not all) details governing Administrative Requirements, Cost Principles, and Audit Requirements for allowable, allocable, and reasonable costs.

There are instances where AmeriCorps regulations are stricter than the Uniform Guidance. For example, volunteer time generated by an organization may be counted as match under some federal grants, but not under AmeriCorps grants. Be sure to stay current on the grant terms & conditions, and be familiar with [45 CFR Part 2522](#) for such exceptions to the Uniform Guidance.

Financial Management

The Basics of a Responsible Financial Management System

The program must maintain financial management systems that comply with [2 CFR 200.302\(b\)](#). Financial management system requirements include, but are not limited to:

- Identifying all AmeriCorps funds received and expended, by program year and by budget category, and differentiating between direct and indirect costs,
- Accurate, current, and complete disclosure of the AmeriCorps funds, and
- Control and accountability for records containing AmeriCorps funds, as supported by source documentation.

Programs must have written policies and procedures related to financial management and must be consistent in applying them to federal funds, including AmeriCorps. Organizations should use Generally Accepted Accounting Principles (GAAP), including but not limited to:

- Internal controls: policies and procedures that help ensure financial reporting is reliable, assets are safeguarded, and fraudulent activities are prevented.
- Risk assessment: programs must identify risks that could affect their objectives.
- Separation of duties: no single person has enough authority or information to introduce errors into financial transactions or commit fraud.
- Authorization: authorization and approval limits should be reviewed periodically.

Allowable Costs

Except where otherwise authorized, costs must meet the following general criteria in order to be allowable ([2 CFR 200.403](#)):

- Be reasonable and necessary for the performance of the grant award.
- Conform to any limitations or exclusions in the award as to types or amounts of cost items.
- Be consistent with the policies and procedures of the organization.
- Be accorded consistent treatment.
- Be determined in accordance with generally accepted accounting principles (GAAP).
- Not be included as a cost or used to meet cost sharing requirements of other federal programs.
- Be adequately documented.
- Be incurred during the approved budget period.

Pre-award Costs

A request to spend CNCS or Grantee share funds prior to the budget period start date requires advance, written approval by GOCS. To request advance approval for pre-award costs, read the grant terms & conditions, then submit a request letter to GOCS. Letters should be on organizational letterhead, include concise rationale description of the cost, share of cost, and the amount, and be signed by an Authorized Representative. Some requests may require AmeriCorps approval. GOCS will respond in writing to approve, decline, or clarify the request.

Disallowed Costs

The financial management of a program is overseen in three ways: monthly Periodic Expense Reports (PER), quarterly Federal Financial Reports (FFR), and fiscal compliance monitoring. If a program does not comply with the grant provisions and OMB requirements, costs that have been charged to the grant can be questioned and disallowed. A seriously inadequate financial management system may prompt GOCS or AmeriCorps to withhold reimbursement payments, implement a manual hold, suspend funds for a duration, terminate the grant, recover funds, or take other legal action.

Avoid disallowed costs by:

- Maintaining robust records;
- Implementing adequate accounting principles that follow GAAP;
- Having strong and practical internal controls;
- Following policies & procedures;
- Submitting accurate and timely financial status reports; and
- Correctly documenting all matching contributions, particularly in-kind.

Taxes and Insurance

- **Liability Insurance Coverage.** The program is responsible for providing GOCS proof of adequate general liability coverage for the organization, staff, and members, including coverage of members engaged in on- and off-site activities. Insurance costs are generally allowable and may be charged to the grant as an administrative cost on a pro-rated basis or included in program match. If insurance is included in the approved budget, insurance purchased specifically for the AmeriCorps program may be charged as a direct program cost.
- **FICA.** Unless exempted by the IRS, all programs are required to pay FICA for budgeted staff and for members receiving a living allowance. Under federal law, the FICA payment rate is 15.3

percent of the living allowance. Half (7.65 percent) is paid by the program and half is deducted from the member's living allowance. FICA payments cover Social Security and Medicare benefits.

- **Income Taxes.** Income tax rules apply to member benefits. A living allowance is taxable as "compensation for services" and is subject to federal withholding. Room and board also may count as income subject to withholding, even though the members do not receive cash. Income eligible members may be able to claim an exemption from withholding if (1) they had no tax liability in the previous year, and (2) they expect to have no tax liability in the current year. State income tax withholding laws also apply. Members receiving a living allowance must complete a W4 form at the start of the term of service. At the end of each applicable tax year, programs must provide each member a W2 form.
- **Worker's Compensation.** Members are eligible for worker's compensation, which is an allowable grant expense. Refer to the ASN Terms & Conditions and the [MT Dept. of Labor & Industry](#)
- **Unemployment.** AmeriCorps Montana members are *not* eligible for unemployment insurance.

Member Living Allowance

Requirements related to member living allowances and benefits are in [45 CFR 2522.240](#) and [2522.250](#). In addition, programs must ensure appropriate living allowance distribution.

A living allowance is not a salary or a wage. Members must receive the living allowance in regular increments, such as weekly or bi-weekly, over the term of service. Payments should not fluctuate based on the number of hours served in any service period and must cease when the member's service ceases. See the [Living Allowance Distribution FAQ](#).

- For members completing hours prior to completion of the term of service, they may be exited with an award, but may only receive a payment for the period during which they were actively serving.
- If a member serves no hours during a period, they will still receive a living allowance.

Timekeeping

Individual timekeeping records (time sheets) must be kept for all grant covered individuals, regardless of their status as exempt or non-exempt, and must have direct supervisor approval.

Members: The program must have a timekeeping system that is compliant with [2 CFR 200.430](#) per the grant terms & conditions. Time and attendance recordkeeping must be conducted by the AmeriCorps member's supervisor. This is used to document member eligibility for in-service and post-service benefits. Timekeeping records must be current within 30 days. It is recommended if a member goes 30 days without completing service hours, the member be suspended or released. See Chapter Four: Member Management, subsection [Member Release from Participation](#).

Staff: All grant covered staff must have a timekeeping record. Timekeeping records must identify the individual source of funds to which time is being charged to the AmeriCorps grant. This is especially important for staff who are partially funded under the AmeriCorps grant and whose other duties would be unallowable under AmeriCorps funding, such as lobbying or fundraising activities.

Program Income

Program income, defined in [2 CFR 200.307](#), includes fees for service earned as a direct result of AmeriCorps program activities during the award period. Program income must be retained by the

program and used to meet the cost sharing/matching requirement. Programs are encouraged to spend program income at the time it is earned to ensure there is not excess program income at the end of the grant period.

Program income earned in excess of the amount needed for the grantee share must follow the appropriate requirements of [2 CFR Part 200](#) and be deducted from the total AmeriCorps federal share. Programs are required to report excess program income in the comment box on the PER and FFR. Reach out to the GOCS Fiscal Officer with any questions regarding program income.

Match Requirements

As of May 2024, AmeriCorps announced a [Final Rule](#) that would change the matching requirements for AmeriCorps State and National programs. While the new Final Rule will go into effect October 1, 2024, AmeriCorps has not yet released the implementation plan as of the publication of this document. The information below refers instead to match requirements prior to October 2024.

Each line-item budget program must meet matching requirements as described in the Notice of Funding and AmeriCorps regulations. A first-time program is required to match 24% for the first three-year funding period. Starting in year four, the match requirement gradually increases each year.

Funding Year	1, 2, 3	4	5	6	7	8	9	10+
Required Match	24%	26%	30%	34%	38%	42%	46%	50%

There is no specific matching requirement for fixed amount programs; however, matching funds are necessary to successfully operate an AmeriCorps program. Fixed amount subrecipients will be asked to identify the total amount budgeted to operate the program, and explain how the program will raise the additional resources needed.

Acceptable sources of matching funds ([2 CFR 200.306](#)) are state, local, private, cash, and/or in-kind contributions.

Valid Documentation of Cash and In-Kind Match:

- Donations, letters/statements of costs that show the type of contribution, value, and frequency.
- Time and effort forms or others that show contribution of time to program by staff.
- In kind receipt/voucher forms, such as professional services, meetings held in donated space, public service announcements, and recognition events.

AmeriCorps legislation permits the use of non-AmeriCorps federal funds as match for AmeriCorps programs if discussed with, and approved by, the non-AmeriCorps federal agency. If intending to use other federal funds as match for an AmeriCorps grant, contact the GOCS Fiscal Officer to determine proper documentation.

Budget and Programmatic Changes

All budget and programmatic changes must comply with [2 CFR 200.308](#) and [2 CFR 200.407](#).

Programmatic Changes. The program must obtain prior written approval from GOCS and/or AmeriCorps before making any of the following changes:

- Changes in the scope, objectives, or goals of the program.
- Changes in member position types and service locations (See Chapter 2 subsection on [Slot Conversions](#) for information and process guidance.
- Changes in the level of member supervision.
- Changes in the start and end dates of a grant.
- Requests to sub-grant AmeriCorps activities not previously approved.

Budget Changes. Changes to the grant budget should be requested through the budget modification form found in the PER. The program must obtain prior written approval from GOCS and/or AmeriCorps before making any of the following changes:

- Changes to the budget at or above value of 10% of the full award.
- Purchases of equipment over \$5,000 unless specified in the grant award budget.
- Transferring funds from Member Support costs to Program Operating costs.

Retention of Grant Records [2 CFR 200.334](#)

Financial records, supporting documents, and other grant related records must be retained and safeguarded for the period of time described in the subaward contract (up to 8 years). If an audit or other investigation is started prior to the expiration of the retention period, the records must be retained until the audit findings are resolved and the activity is officially closed.

Tip: Be familiar with the retention periods of time and requirements of other entities as it pertains to the AmeriCorps award (e.g., organizational policies, MTDOJ Criminal history checks, AmeriCorps Education Awards). Records must adhere to the longest standard required.

Financial Reporting & Closeout Requirements

The Periodic Expense Report (PER) and Federal Financial Report (FFR) provide information on program spending. The program is responsible for timely and accurate submission of the PER and FFR during the project period. Due dates are listed in the directions of each PER. Programs must request an extension in writing if the required due date cannot be met. Late or inaccurate reports are considered an indication of poor performance and may impact future funding recommendations. The completed forms must be signed by an Authorized Signer.

- **PER.** A record of expenses accrued by each program monthly, also serves as a request for reimbursement. PERs are emailed to the program's designated fiscal staff. Line-item grant PERs contain the detailed budget, while fixed amount grant PERs include a report on member service hours. If there are zero (0) expenses to report, programs must submit a zero report.

PERs are due by the last day of the month following the prior months expenses, for example:

Due Date	Reporting Period
March 31	February 01 thru February 28
April 30	March 01 thru March 31

- **FFR.** Line-item programs must complete and submit an FFR twice per grant year, see the PER for FFR reporting forms and instructions.

Due Date	Reporting Period
April 15	September 01 thru March 31
October 15	April 01 thru September 30

At the end of the annual budget period, fixed amount grantees must reconcile member service hours, partial terms, and refilled positions on the year-end rollup

- **Reporting Other Federal Funds.** The program must report the amount and sources of federal funds, other than those provided by AmeriCorps, claimed as matching funds. This information is reported annually on the FFR due October 15 or at the time the final PER is submitted. Fixed amount programs are not required to report this information.

Closeout Process

All activity must conclude and all members must be exited for closeout to occur. Final reporting related to closeout is outlined in the AmeriCorps State & National Terms & Conditions, under “Reporting Requirements.” Close-out forms are due to GOCS at 5:00 pm MST, 45 days following the end of the grant period, and are available online under Grant Closeout: <https://serve.mt.gov/ameriCorps/program-management>

Audit Requirements [2 CFR 200.501](#)

Single Audit. Organizations that expend \$750,000 or more in federal awards must have a single audit performed in accordance with the [2 CFR 200.514](#). If subject to an audit, the program must make GOCS aware when the audit is published on the Federal Audit Clearinghouse.

Payment Integrity Information Act of 2019 (PIIA) and Sampling. The PIIA directs federal agencies to determine whether their programs are susceptible to significant improper payments within that program. AmeriCorps is required to fully implement all laws passed by Congress that relate to usage and accountability of federal funds. PIIA Sampling may be conducted by AmeriCorps at any time and is typically an email request. See [31 USC 3351 et seq.](#)

Based on past sampling, GOCS has observed that timelines stated in request emails may or may not be followed by AmeriCorps.

Management Decisions. In alignment with [2 CFR 200.332 \(d\)\(3\)](#), for subrecipient organizations that meet the Single Audit threshold, GOCS issues management decisions on findings related to the AmeriCorps award either annually or biannually, depending on subrecipient audit frequency. If there are no findings associated with the AmeriCorps Award, GOCS will document this and still issue a management decision letter.

AmeriCorps Office of the Inspector General (OIG)

AmeriCorps' OIG is an independent office established to help improve AmeriCorps programs and operations. The OIG has the responsibility of keeping AmeriCorps' Chief Executive Officer and Congress informed about problems and deficiencies relating to programs and operations nationwide. The OIG conducts and supervises audits and investigations that prevent and detect fraud, waste, and abuse.

Per statute, the OIG has full access to all records, reports, and other available material to conduct this work. The OIG coordinates with other organizations, including federal, state, and local law enforcement agencies, on matters of fraud, waste, and mismanagement. Examples and cautionary tales:

<https://www.americorpsoig.gov/>

When to Contact the Office of the Inspector General

There are two types of inquiries to the AmeriCorps OIG: general inquiries and hotline reports: General inquiries and reporting instances of fraud, waste, abuse, or mismanagement, see the AmeriCorps OIG website for more information: <https://www.americorpsoig.gov/contact-us>.

Programs should contact the OIG whenever the organization discovers information indicating there may be waste, fraud, abuse, or any violation of criminal law at the program or service site.

Note: *Montana programs may choose to contact GOCS before, during, or after making a report to the OIG. Please be encouraged to inform GOCS so we are aware and can assist in navigating the situation.*

Chapter Six

Training and Technical Assistance

GOCS is committed to providing quality assistance with the philosophy, “the success of Montana’s AmeriCorps programs is our responsibility.” GOCS coordinates training, sponsors events, and provides information about local, regional, and national training opportunities for staff and members. Program staff are encouraged to partner and create a collaborative environment where best practices and challenges are regularly shared. Program staff may be provided resources to attend training events that contribute to staff development and AmeriCorps expertise.

Technical Assistance

- **AmeriCorps Regulations and Guidance** – subgrantees must become familiar with regulations, guidance, terms and conditions, and other governing documents related to administration of AmeriCorps grants. These documents are referenced throughout this guide and also can be found in summary in [Chapter 7: Additional Resources](#).
- **GOCS Email Distribution List** – GOCS staff strive to update subrecipients by email regarding policy and program developments, important upcoming dates, AmeriCorps requests for input, upcoming training opportunities, and more. It is critical for program directors to review and share this information with program staff, members, and other relevant personnel and keep GOCS updated about changes of contact information.
- **Montana AmeriCorps Basecamp:** Collaborative online space for program staff: [click here to access](#). GOCS posts call notes, annual calendars, upcoming trainings, and contributes to conversations when appropriate.

Training

AmeriCorps Program Staff Training Requirements:

- ☐ Bi-monthly calls & August Convening (Program Directors)
- ☐ Staff Check-Ins with GOCS Primary Grant Contact; at least monthly for the first year
- ☐ Annual Required Litmos eCourses – 2 staff per organization:
 - National Service Criminal History Check training
 - Key Concepts of Financial Grants Management Training
 - Fraud Awareness Training for AmeriCorps Grantees
 - Developing Policies and Procedures training for AmeriCorps State and National Grantees
- ☐ [45 CFR 2522/2 CFR 200](#) All Program Directors and new staff are expected to familiarize themselves with federal grants regulations.
- ☐ America’s Service Commissions (ASC) AmeriCorps Program and Fiscal Boot Camps: new program and fiscal staff are expected to attend
- ☐ At least one staff member per organization is expected to attend each of the following annual trainings:
 - Governor’s Office of Indian Affairs Tribal Relations Training
 - ASC National Service Training

Training and Technical Assistance Directory

The GOCS Training and Technical Assistance (TTA) Directory is a resource for Montana ASN and AmeriCorps VISTA program staff to connect with trainers and consultants across the U.S. Those included in the directory have established areas of expertise and commitment to local, state, and national service programs. [ServeMontana TTA Directory 2023](#)

Staff Training Events: In-State

- *Program Director Bi-Monthly Conference Calls* – Attendance is required per the subaward contract with GOCS; program updates must be submitted prior to the call. Calls are scheduled on the second Wednesday of every other month and typically begin at 2:00 pm. If designated program staff is unable to attend, they must find a staff member to attend in their place. Please do not bring AmeriCorps members on this call.
- *Program Director Convening* – GOCS convenes program and fiscal staff for updates, professional development, and networking. One program and one fiscal staff are expected to attend this annual event. The convening is typically held the second week of August, in place of the bi-monthly program director call.
- *ServeMontana Symposium* – GOCS's signature event! This all member gathering brings all streams of AmeriCorps in Montana together each March to serve, learn, grow, reflect, and promote civic engagement. Each program is required to support planning and to attend this multiday event, <https://serve.mt.gov/ameri-corps/serveMontana-symposium>
- *University of Montana Public Service Academy (summer)* - Annual 2 day conference for public service professionals <https://www.umt.edu/law/mpa/training/psa/default.php>

Staff Training Events: Out of State

After confirming your AmeriCorps program budget and/or organization cannot pay for training costs of attendance, contact GOCS to ask if there are other resources available.

- America's Service Commissions' AmeriCorps Program & Fiscal Boot Camps (fall)
- National Service Training (spring) <https://www.nationalservicetraining.org/>
- Leadership Forum for National Service Executives, in Seattle, WA
<http://servewashington.wa.gov/programs/ameri-corps/subgrantee-resources/leadership-forum-national-service-executives>
- National Grants Management Association: Annual conference, training events, and for members, monthly webinars <https://www.ngma.org/events-trainings>
- Feldesman Training Solutions: Federal Grantee Trainings <https://training.feldesman.com/>
- Points of Light Foundation's Conference on Volunteering and Service
<https://www.pointsoflight.org/points-of-light-conference/>

GOCS Sponsored Travel for Program Staff Training: Reimbursement Process

When GOCS reimburses an organization for program staff to travel and/or attend training, the legal applicant's organization should use *non-grant resources* to initially cover the costs. Because the event is not budgeted in the program grant and *is budgeted in GOCS grants*, training funds should not come from the AmeriCorps grant budget.

- The process to submit a request for reimbursement is as follows:
 1. Traveler submits completed travel documentation to their organization's fiscal staff for reimbursement.

2. The authorized organization staff submits a signed invoice to GOCS, with the complete travel documentation included for review and reimbursement. Reimbursements are made to organizations, not individual staff.
- GOCS sponsored travel is reimbursed *only* at state rates for mileage, lodging, and per diem.

GOCS reserves the right to request reimbursement from subrecipients for any costs resulting from late registration, non-attendance by registered participants, or other actions by persons associated with the program staff or members. All costs relative to such requests must be paid from non-federal sources.

Chapter Seven

Additional Resources

America's Service Commissions (ASC): <http://www.statecommissions.org/>

- AmeriCorps Program membership provides resources for program staff and the member assistance program (MAP) for participants: <https://www.statecommissions.org/ameri-corps-member-assistance-program>

AmeriCorps Resources: Program staff should be familiar with navigating and locating resources on the [GOCS website](#), [Montana AmeriCorps Basecamp](#), and [AmeriCorps.gov](#)

- Resources: <https://americorps.gov/grantees-sponsors/state-subgrantees>
- Statutes and Regulations: <https://americorps.gov/about/agency-overview/statutes-regulations>

AmeriCorps Alumni Nationwide network: <https://serviceyear.org/ameri-corpsalums/>

AmeriCorps Alumni Montana, Last Best Alums: <https://www.lastbestalums.com/>

AmeriCorps Program Evaluation: All programs must comply with the AmeriCorps evaluation requirements as stated in the appropriate years' Notice of Funding and grant terms and conditions.
<https://www.americorps.gov/grantees-sponsors/evaluation-resources>

AmeriCorps National Service Criminal History Checks (NSCHC): <https://americorps.gov/grantees-sponsors/history-check>

AmeriCorps Office of Inspector General: <https://www.americorpsoig.gov/>

AmeriCorps Online Learning Site (Litmos): <https://americorpsonlinecourses.litmos.com/account/login/>

- Access and complete the required eCourses; send certificates of completion to GOCS.

AmeriCorps Performance Measurement Core Curriculum: <https://americorps.gov/grantees-sponsors/national-performance-measurement-core-curriculum>

Community Tool Box: The [Community Tool Box](#) is a rich online resource for and by those working to build strong, healthy communities. Topics range from assessment to intervention development, to evaluation, and beyond.

Education Award:

- <https://americorps.gov/members-volunteers/segal-ameri-corps-education-award>
- <https://mtcompact.org/awards-scholarships/segal-ameri-corps-education-award-and-match/>

Governor's Office of Indian Affairs: <https://tribalnations.mt.gov/>

Peace Corps: <https://www.peacecorps.gov/>

PsychArmor®: <https://psycharmor.org/> Resources to better support military personnel, veterans, and families.

7 Cups: <https://www.7cups.com/> Connects individuals to caring listeners for free emotional support.

ServeMontana Program Management Page: <https://serve.mt.gov/ameri-corps/program-management>

Key Definitions and Acronyms

America's Service Commissions (ASC) - A nonpartisan nonprofit organization representing and promoting state service commissions from states and territories across the US. A peer network of governor-appointed commissioners and state service commission staff. Offers program membership & benefits.

AmeriCorps – The “doing business as” name and an umbrella term that refers to all programs designated as national service programs and the participants serving. AmeriCorps programs include AmeriCorps State & National, AmeriCorps VISTA (Volunteers In Service To America), and AmeriCorps NCCC (National Civilian Community Corps). AmeriCorps Seniors now refers to the programs formerly called Senior Corps.

AmeriCorps Member – An individual selected to serve and enrolled into an approved service position should be referred to as an AmeriCorps member, service member, or national service participant, not a volunteer, worker, staff, participant, or employee. The word *member(s)* is lowercase.

AmeriCorps National Service Network – Refers to all the subrecipients affiliated with AmeriCorps—including AmeriCorps NCCC, AmeriCorps VISTA, AmeriCorps State and National, AmeriCorps Tribes and Territories, the AmeriCorps Education Award Program (EAP).

AmeriCorps NCCC (National Civilian Community Corps) – A residential AmeriCorps program in which 18-24 year-old members are housed and trained together on military bases and deployed in teams to service sites throughout the surrounding region. Often referred to simply as “NCCC”, pronounced “N Triple C.”

<https://americorps.gov/serve/fit-finder/americorps-nccc>

AmeriCorps State & National – Used when referring to grants or funding, AmeriCorps State grants are distributed through state service commissions; AmeriCorps National Direct grants are distributed to organizations directly from AmeriCorps.

AmeriCorps VISTA (Volunteers In Service To America) – Full-time, National Service program for eligible individuals age 18 and older interested in developing sustainable solutions to poverty in communities across America. Members serve with nonprofit, faith-based, and community organizations and agencies to increase capacity, develop infrastructure to expand services, strengthens programs, and empowers low income individuals. Under the AmeriCorps umbrella and administered by AmeriCorps. Sometimes simply referred to as “VISTA.”

Audit – An official inspection of an individual's or organization's accounts, typically by an independent body. An audit is not the same as compliance monitoring.

Campus Compact – A national organization of college and university presidents with numerous state affiliates committed to advancing service on their campuses. <http://compact.org/>

Civic Engagement – The skills, knowledge, and actions to live in a participatory society. Often involves people of all ages working, serving, or volunteering to make a difference in through political and non-political outlets.

Code of Federal Regulations (CFR) – [45 CFR 2520](#) governs AmeriCorps, use the link to search & locate important information.

Community Based Organization (CBO) – Any private non-profit organization (including faith-based organizations) that is representative of a community or a significant segment of a community and is engaged in meeting human, environmental, or public safety needs.

Commission Investment Funds (CIF) – Funds provided to state commissions to facilitate increased Commission capacity and the ability to provide training and technical assistance to subrecipients. Funds vary from year to year as per Congressional appropriations. Also known as **Training and Technical Assistance (TTA)** funds.

Compliance Monitoring – the process of reviewing funded programmatic and financial grant components against federal and state requirements, organizational operations, governance, grant policies and procedures.

Corporation for National and Community Service (CNCS) – The legal name of the independent federal agency that encompasses the work and staff of two previously existing agencies, the Commission on National and Community Service and ACTION. Created by the National and Community Service Trust Act of 1993.

Domestic Volunteer Service Act of 1973 – The Domestic Volunteer Service Act authorized VISTA, the Foster Grandparent Program, the Senior Companion Program, and the RSVP program. The legislation was amended in the early 1990's with the National and Community Service Trust Act which created the Corporation for National and Community Service, AmeriCorps, and State Service Commissions.

Education Award – A post-service benefit earned by AmeriCorps members who successfully complete a Term of service. Alums can apply the award directly toward cost of attendance at a qualified educational institution approved vocational training and may be used to pay off federally backed education loans.

Education Award Program (EAP) – An AmeriCorps program that receives an administrative grant, member positions, and Education Awards. Uses nonfederal resources to pay living allowances and support program costs.

Edward M. Kennedy Serve America Act of 2009 – [The Edward M. Kennedy Serve America Act](#) reauthorized and expanded national service programs administered by AmeriCorps by amending the National and Community Service Act of 1990 and the Domestic Volunteer Service Act of 1973. Signed by President Barack Obama in 2009. Also known as the Serve America Act.

eGrants – The AmeriCorps grant and member management system <https://egrants.cns.gov/espan/main/login.jsp>

Employers of National Service – An initiative to connect AmeriCorps alumni with employers from the private, public, and nonprofit sectors. Through this initiative, employers have increased access to a dedicated, highly qualified, and mission-oriented pool of applicants, and National Service alumni have additional opportunities to apply their skills in the workplace. <https://americorps.gov/partner/partnerships/employers-national-service>

Fiscal Year – A 12-month period during which a particular budget is to be expended and accounted for and reported. The Federal Fiscal Year begins on October 1 and ends September 30. The Montana State Fiscal Year begins July 1 and ends June 30.

Fixed Amount Grant – Allows organizations to apply for a fixed-amount per individual member service year (MSY). Organizations operate a standard AmeriCorps program with full-time members, or less than full time positions, serving in a full-time capacity only.

Formula Funding – The allocation awarded to each State Commission annually by AmeriCorps. The formula allocation is determined by a population-based formula. The Commission then solicits proposals for AmeriCorps formula funded programs and, when feasible, planning grants.

Foster Grandparent Program (FGP) – One of three AmeriCorps Seniors programs. Foster Grandparents devote their service to children with special or exceptional needs, and typically serve in schools.

Generally Accepted Accounting Practices (GAAP) – Refer to a common set of accounting principles, standards, and procedures issued by the Financial Accounting Standards Board (FASB).

Grantee – The direct recipient of a grant from AmeriCorps. In the AmeriCorps State model, the **Prime Grantee** is the state commission. AmeriCorps funds are granted directly to the state commission and are then subgranted to organizations that operate AmeriCorps programs. The prime grantee is ultimately responsible for ensuring AmeriCorps funds are used appropriately.

Grant Covered Individual – In reference to the NSCHC, these individuals are required to undergo the NSCHC prior to charging time to the grant. This includes members of all grant types, and staff that appear on a grant application budget for line item budget grant types.

In-Kind – Contributions and donations made in goods and services, not cash.

Learn and Serve America – A U.S. government program under the authority of the Corporation for National and Community Service. Its mission was to provide opportunities for students to participate in service-learning projects. In 2011 the U.S. House Appropriations Committee eliminated the budget for Learn and Serve America.

Living Allowance – AmeriCorps members may receive a living allowance during the Term of Service. This is a benefit distributed incrementally to the participant, based on the term of service. A living allowance is separate from an end of service stipend (*see stipend.*) AmeriCorps members earn a **Living Allowance** - not a salary or wage.

Matching Funds – State commissions and the subrecipients they fund must meet certain specified match requirements as a condition to receive federal funding. For every dollar of federal funds, there is a designated percentage of nonfederal funds that state commission and subrecipients must provide, this is the “match.”

Members – Participants in AmeriCorps (AmeriCorps NCCC, AmeriCorps VISTA, and AmeriCorps State & National). AmeriCorps members *serve* with the AmeriCorps program; they are not employees who work or volunteers for AmeriCorps or the program. [*Montana Code Annotated \(MCA\) 39-51-204.*](#)

Mission Statement – A mission statement expresses how an organization or program will deliver its vision regarding National Service and indicates the ultimate impacts to be achieved. A program’s annual objectives should closely connected to the mission statement, service activities, and performance measures.

National and Community Service Trust Act of 1993 – Created AmeriCorps and the Corporation for National Service. The act authorized appropriations for AmeriCorps State & National, AmeriCorps NCCC, Learn & Serve America, the National Service Trust, and the Points of Light Foundation. The 1993 legislation amended the National and Community Service Act of 1990.

National Competitive Funding – An annual pool of funds in which state commissions may compete nationally to fund AmeriCorps subrecipients in their states. Funds available are subject to Congressional appropriations.

National Day of Service – A project undertaken by a group of participants, often from many different programs and usually in conjunction with a special day, to highlight service programs and their participants, such as Martin Luther King Jr. Day or Global Youth Service Day.

National Directs (AmeriCorps National) – AmeriCorps programs funded directly by AmeriCorps through multi-state organizations that deploy members into more than one state.

National Senior Service Corps (NSSC) – The umbrella term that encompasses the three senior service programs: Foster Grandparents, Senior Companions, and the Retired Senior Volunteer Program (RSVP).

National Service – Results-oriented service by an individual or group of individuals that serve to meet the nation’s needs in the areas of education, public safety, the environment, and other needs.

NOFA (Notice of Funds Available) – An announcement of a public funding opportunity describing the intention of availability that is approved by Congress.

NOFO (Notice of Funding Opportunity) – An announcement of a public funding opportunity describing the availability of funding that is subject to Congressional appropriations.

Participant – Term used to describe any individual enrolled in a program funded by AmeriCorps; the more specific term “member” refers to an individual enrolled in an AmeriCorps program.

Partnership – Two or more entities that have entered into a written agreement specifying the goals and activities of the relationship as well as the responsibilities, goals, and activities of each partner.

Peace Corps – A service opportunity for motivated citizens to immerse themselves in a community abroad, working side by side with local leaders to tackle the most pressing challenges of our generation.

<https://www.peacecorps.gov/>

Presidents’ Summit for America’s Future – A 1997 gathering where former Presidents Clinton, Bush, Carter, and Ford, and Secretary of State Colin Powell called for Americans to ensure all children have access to fundamental resources: caring adults; safe places with structured activities to learn and grow; a healthy start and healthy future; effective education that equips them with marketable skills; and opportunity to serve their communities.

Program Evaluation – The use of research methods to assess program design, implementation, and effectiveness.

<https://americorps.gov/grantees-sponsors/evaluation-resources>

AmeriCorps Program – A coordinated group of activities linked by elements such as recruitment, selection, and training of participants and staff, regular group activities, and assignment to projects organized for the purpose of achieving the goals of meeting needs with National Service; carried out with assistance provided under the Act.

Project – An activity, or set of activities, carried out through a program that receives assistance under the Act, resulting in a specific service or improvement that otherwise would not be done with existing funds, and does not duplicate the services or functions of the organization where participants are assigned.

PSA – Public Service Announcement.

Request for Proposals (RFP) – A term which some states or organizations use to describe the process by which they solicit proposals from other organizations. State commissions may use RFP’s to call for AmeriCorps program proposals from eligible organizations.

Retired and Senior Volunteer Program (RSVP) - One of three AmeriCorps Seniors programs created in 1972. RSVP pairs thousands of people age 55+ with community organizations that create service opportunities.

<https://americorps.gov/serve/fit-finder/americorps-seniors-rsvp>

Returned Peace Corps Volunteer (RPCV) – A Peace Corps alumni.

SEA – State Education Agency. In Montana, the Office of Public Instruction (OPI). <http://opi.mt.gov/>

Senior Companion Program (SCP) – One of three AmeriCorps Seniors programs. Senior Companions help other seniors live independently in their own homes and receive a stipend. <https://americorps.gov/serve/fit-finder/americorps-seniors-senior-companion-program>

Service-Learning – A method by which students improve academic learning and develop personal skills through structured service projects. Service-learning builds upon students’ service activities and provides them with opportunities to learn by preparing, leading, and reflecting on the service experience.

Service Location – The primary location where the AmeriCorps member contributes most of their service. The site is typically an eligible organization selected to provide a placement for the participant(s), either as a primary service location or a short-term project. Qualifications and responsibilities of service locations vary between subrecipients and should include oversight to ensure member activities are allowable and service hours are verified. *Upon enrollment, members must be assigned to an active primary service location in eGrants within 8 days.*

Service Recipient – A community, person, or group benefitting from AmeriCorps service, aka a beneficiary.

State Commission – A 15–25-member, independent, bipartisan or nonpartisan body appointed by a Governor to implement service in a state. Duties of a State Commission include developing a unified State Plan for service and volunteering in the state, submission of the state’s AmeriCorps applications, administration of the competition for AmeriCorps State programs, oversight and monitoring of funded AmeriCorps programs, and reporting to AmeriCorps. <https://serve.mt.gov/who-we-are/Commission>

State Service Plan (SSP) – A three-year plan developed by each state commission in partnership with AmeriCorps and other organizations in the state. The State Service Plan describes the vision, goals, and objectives for promoting National Service and volunteering and for building a solid portfolio of high-quality programs and support services in the state. <https://serve.mt.gov/who-we-are/State-Service-Plan>

Stipend – An end of service cash benefit that is an alternative to the Education Award – an option only for AmeriCorps VISTA members. The term is **not** synonymous with living allowance.

Stream of Service – A term referring to the distinct types of service programs. Streams of service under AmeriCorps include: AmeriCorps State & National, NCCC, VISTA, and AmeriCorps Seniors (Foster Grandparents, Senior Companion Program, and RSVP). When there are joint activities the term ‘cross stream’ is commonly used.

Subrecipient/Subgrantee - The eligible organization granted AmeriCorps resources as part of GOCS’ portfolio. Responsible for recruiting, selecting, and training members, providing benefits and support services, engaging regular group activities and service assignments. Responsible for the AmeriCorps program and management of federal funds, but may or may not oversee the daily activities of AmeriCorps members, as determined by program design.

Youth-Led Service – Young people leading and providing service to schools and communities. Not to be confused with “youth services,” which refers to programs where youth are the recipients of service.

Remember to check the Mandatory Supplemental Information document associated with the Notice of Funding Opportunity that the program was funded through for more terms and definitions. See AmeriCorps grants on www.serve.mt.gov, then locate the correct year, funding type, and documents.

WHEN TO CONTACT GOCS

General	Contact requirement	Point of contact
Appeal: funding decisions	Required	Director
National Service Day: event	Required	Communications Specialist
News story: program specific	Recommended	Communications Specialist
Press/media events/news coverage	Recommended	Communications Specialist
Service events	Recommended	Communications Specialist
Training needs and opportunities	Recommended	Training Specialist

Financial Management	Contact requirement	Point of contact
Budget modification or amendment	Pre-approval required	Fiscal Officer
Equipment purchase: unbudgeted	Required	Fiscal Officer
Grant closeout	Required	Fiscal Officer
Grant funds <u>will not</u> be fully expended	Required – contact ASAP	Fiscal Officer
PER, RFR, FFR: submissions, extensions, questions	Required	Fiscal Officer
Pre-award grant spending	Pre-approval required	Fiscal Officer
Single Audit: Major findings, when posted to https://facweb.census.gov/uploadpdf.aspx	Required	Fiscal Officer

Grants & Program Management	Contact requirement	Point of contact
Changes in key program or fiscal staff	Required	Assigned Grants Contact
Changes to program scope	Pre-approval required	Assigned Grants Contact
Contract amendment	Required	Assigned Grants Contact
eGrants problem: application submission	Required – provide documentation	Assigned Grants Contact, Hotline if time sensitive
eGrants problems: general	Contact Hotline first	AmeriCorps Hotline
Entering partnerships not included in original subgrant	Required	Assigned Grants Contact
Grant extension request	Required - 30 days in advance	Assigned Grants Contact
Grievance filing (service site/staff)	Recommended	Assigned Grants Contact
Grievance filing (member)	Required	Assigned Grants Contact
Progress report: submissions, extensions, questions	Required	Assigned Grants Contact
Member slots left unfilled	Required	Assigned Grants Contact
Member suspension	Required	Assigned Grants Contact
Member site transfer	Required	Assigned Grants Contact
Member serious injury or death	Required	Assigned Grants Contact
Member release: compelling personal circumstance	Recommended - optional	Assigned Grants Contact
Member release: for cause	Required (felony or drug)	Assigned Grants Contact
Reasonable accommodation	Recommended	Assigned Grants Contact
Reporting/submission deadlines	Consult website first	serve.mt.gov
Self-identified NSCHC noncompliance	Required	Assigned Grants Contact & Fiscal Officer
CRISS site visit from MT DOJ	Required	Assigned Grants Contact & Fiscal Officer
Slot conversion: Use form	Pre-approval required	Assigned Grants Contact