



To: Montana Commission on Community Service and AmeriCorps Grantees

From: Montana Office of Community Service (OCS)

Date: March 20, 2020

Re: Montana COVID19 Guidance and Alternative Service Activities AmeriCorps State programs

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**Purpose**

This Montana COVID19 Guidance is intended to provide useful information for all ServeMontana AmeriCorps programs to use for AmeriCorps grant and member management in response to the pandemic. Keep a copy of the Governor's declaration, this memo, and associated approvals with your grant records.

**Health, Wellbeing, and Safety**

The health, wellbeing, and safety of AmeriCorps program staff and members is everyone's shared priority. OCS directs grantees to comply with guidelines and gubernatorial declarations <http://governor.mt.gov/Home/Governor/eo>. Take responsibility for communicating up-to-date information on preventing the spread of COVID-19 to AmeriCorps members, personnel, and the public.

**Reliable sources COVID-19 information are:**

Montana Department of Public Health and Human Services,  
<https://dphhs.mt.gov/publichealth/cdepi/diseases/coronavirusmt>

Center for Disease Control (CDC): <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

Federal government response to Coronavirus, COVID19: <https://www.usa.gov/coronavirus#item-214586>

CNCS COVID-19 FAQs <https://www.nationalservice.gov/coronavirus>

OCS strongly encourages all AmeriCorps members to wash their hands while reciting the entire AmeriCorps pledge: <https://www.nationalservice.gov/programs/amicorps/current-members/amicorps-pledge>

**Reasonable Accommodations**

If an AmeriCorps member notifies their program about a comprised immune system or other high-risk factors, the program should follow their reasonable accommodation policy and determine alternative service for the member, as appropriate.

**Member Assistance Program**

America's Service Commissions has opened and waived the enrollment fee for the [Member Assistance Program](#), an online mental health resource. The Member Assistance Program provides 24/7 telephonic counseling services with master's degree-level counselors at 1-800-451-1834. Callers will be asked to identify their program name. An app is



available by searching “All One Health Employee Assistance Program” for mobile devices. Be encouraged to access this benefit. If financial assistance is needed, request resources using the [OCS Outreach and Technical Assistance Fund](#).

#### **DISCRIMINATION AND CONFIDENTIALITY**

OCS directs all grantees to guard against discrimination in response to COVID-19. Maintain appropriate confidentiality of any member(s) and volunteer(s) who are confirmed to have COVID-19 or other conditions as required by the Americans with Disabilities Act of 1990 (ADA). Refer to [CNCS FAQs](#).

#### **LIVING ALLOWANCE AND BENEFITS**

As a matter of member safety, OCS urges grantees to continue living allowance and program benefits to members. The living allowance supports housing and food. It is critical as other household incomes will be impacted by COVID-19. We strongly encourage grantees to pay living allowance.

#### **SUSPENSION AND LIVING ALLOWANCE**

Suspension of service is a tool available to all grantees for case by case member management. Grantees considering non-disciplinary suspension due to COVID-19 must consult [CNCS FAQs](#) and the [Program Directors Guide](#).

CNCS has determined AmeriCorps State members may receive the living allowance and benefits while suspended from service due to COVID-19. If a grantee decides to pay members while suspended, they must cover living allowance and benefit expenses once members are reinstated.

A member suspended due to COVID-19, may continue to receive the childcare benefit (for up to 12 weeks) and health care benefit provided. To ensure consistent in childcare coverage, the grantee must notify GAP Solutions in writing within five business days after a member status change. GAP Solutions may charge the organization if not informed in a timely manner.

If an individual is suspended for a discipline reason, the living allowance and other benefits must be suspended. Refer to [Program Directors Guide](#).

#### **MEMBER SERVICE CHANGES**

Before submitting the OCS Request for Member Service Change, consider the intended purpose of activity, members safety, and grant management impacts. Your AmeriCorps grant commits to a specific program design, budget, and performance measures. In response to COVID-19, you may request alternate activities and telseservice. OCS encourages grantees to successfully complete service, earn a full education award, and support communities. OCS is working with Governor Bullock, state agencies, and community partners to support your efforts in finding alternative service opportunities.

**Effective March 19, 2020 through the remainder of the 2019-2020 grant period, OCS permits grantees and members to perform alternative activities in response to COVID-19. Activities that are not specifically defined in the approved grant must be requested using the OCS Member Service Change Form. Activities must not be otherwise prohibited or unallowable.**



## **DOCUMENTATION**

If you have alternative service activities, complete the [Request for Member Service Change form](#) under COVID-19 Resources on the OCS website. Documentation must be appropriate for approved activity and all member status changes. OCS will monitor activities for compliance with AmeriCorps Prohibited Activities.

## **TELESERVICE**

AmeriCorps members are permitted to teleserve regular and alternative service activities. Teleservice must occur in Montana. Guidance on teleservice can be found in the OCS Program Directors Guide on pg. 35 and section 4.3.2 AmeriCorps Member Teleservice Policy ([2017.01: AmeriCorps State and National Interim Guidance- Teleservice](#)). It is a best practice to first investigate the ability (e.g. access to internet) of individual members to serve remotely.

## **COMPELLING PERSONAL CIRCUMSTANCES (CPC)**

Extended site closures and sustained disruptions to AmeriCorps service due to COVID-19 may justify a Compelling Personal Circumstance under 45 CFR § 2522.230. OCS encourages all programs to prepare for member release for CPC, due to COVID-19.

Release for CPC means a member can receive a prorated education award and serve in AmeriCorps again. To be eligible to receive a partial Education Award, a member must have completed at least 15% of the term of service. Refer to the CPC in the Program Directors guide.

## **TRAINING MODIFICATIONS**

In addition to alternative service, grantees may make training modifications, including online learning. Members must not exceed the maximum 20 percent aggregate training hours. Programs must monitor training closely and provide instruction to members on training activities and how to report this on the timesheet.

- The following activities are examples of direct service: planning time, program meetings, data collection, and review, briefings on COVID-19, program feedback and reflection, and team development activities.

Due to COVID-19, grantees may need to spend grant funds on safety supplies, training, or other costs that are not in the approved budget. Grantees are not required to receive prior approval for budget modification due to COVID-19 activities.

If a grantee incurs a cost not in the approved budget, document the expense by providing a comment in the Periodic Expense Report (PER). OCS retains authority to disallow costs on the basis it does not pertain to the AmeriCorps program, demonstrates a lack of fiscal prudence, or disregards prohibited activities. OCS and grantees must adhere to the grantee match requirements. If there is a significant change to budgeted match and/or source funds, grantees should contact the OCS Financial Manager.

## **COMMUNICATION**

Beginning March 19, OCS will host weekly calls with grantees to check in, share ideas, questions, and information. Consider daily check-ins by phone or video to allow members to ask questions and stay connected to one other and the program. Send OCS updates about program and member activities reflecting service.