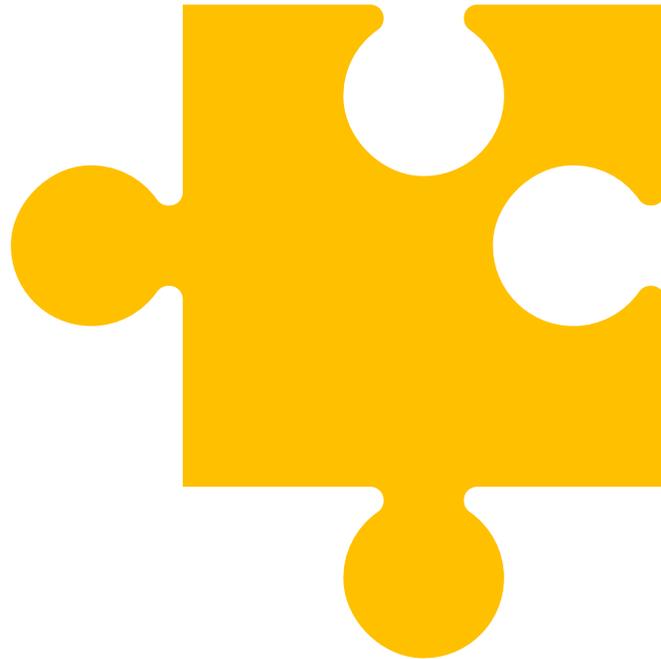


Keeping National Service National: 2021



*A White Paper on How to Make National Service Accessible
to Black, Indigenous, People of Color, and Rural Populations*

Introduction

Volunteer Iowa (the Iowa Commission on Volunteer Service or ICVS) believes in national service and the value it offers to every community and every citizen in our country. However, as a state service commission in a rural state, we are discouraged by policy barriers that prevent resource-challenged organizations, particularly those serving Black, Indigenous, and People of Color (BIPOC) and rural communities, from successfully applying for or operating national service programs.

When we wrote our first white paper on this topic several years ago, we focused on rural communities and small organizations and we were gratified by the responsiveness and willingness of the Corporation for National and Community Service (CNCS)/AmeriCorps to address many of the barriers identified at that time. However, in the meantime new guidance and policy changes have created new barriers, and our commission has also increased our awareness of the challenges faced by BIPOC members and the organizations that serve BIPOC communities.

A recent study by Serve America Together shows that the majority of respondents support expanding service opportunities like AmeriCorps and they see these programs as a good way to help unify the country. Furthermore, 60% of young people of color who were surveyed were interested in serving. We want to make sure there are opportunities available for all those who wish to serve, and we present this updated white paper with the hope that CNCS will engage in the same level of partnership they showed with our first communication. CNCS is in a unique position to make a significant impact on the deep racial divide that remains in our country by engaging Americans from different backgrounds in service together. There are many actions that CNCS can pursue to further this goal, from seemingly simple administrative changes that will create a more welcoming environment for diverse grantees, to broader legislative updates that will help AmeriCorps carry out its mission in our current societal context. We believe that, working together with state service commissions, CNCS has the ability to fulfill the promise that national service offers of being a program for all Americans.

Background

Volunteer Iowa awards and administers multiple grant programs through the Corporation for National and Community Service (CNCS)/AmeriCorps, including AmeriCorps State, AmeriCorps VISTA, and the Volunteer Generation Fund. We also administer state funding to the RSVP Senior Corps (AmeriCorps Seniors) program. In addition, we facilitate other state and federal programs, giving us a perspective on how CNCS operates compared to other funding partners. Our commission leadership recently added a Diversity, Equity, and Inclusion committee to help us identify how to improve accessibility and equity for BIPOC in our work.

Our concerns about the challenges of administering CNCS programs, particularly AmeriCorps State, have continued since the publication of our original white paper. We see now that certain CNCS rules, policies, and guidance create structural barriers for many types of organizations and not just under-resourced ones, including state agencies that have the capacity to run a program but are not willing to deal with administrative requirements that don't further program goals. However, there continue to be particular challenges for minority-led, minority-serving, and rural organizations.

State service commissions like Volunteer Iowa engage in significant program development work because CNCS, particularly under the new regional structure, does not have the presence and capacity required to do so. In our experience, it takes more than two years of one-on-one support to develop a locally-based national service program. While we have helped launch several new programs in recent years, we've also seen others

discontinue or consolidate. On top of the challenges that disproportionately impact some organizations' ability to host CNCS programming, the programs that do exist have identified barriers that prevent local community members from serving in their own communities. Financial burdens, racism, and inequities in program location mean that certain populations find it difficult to enroll in or successfully complete an AmeriCorps term of service, or they are never offered or made aware of the opportunity to serve.

Not only is it important for national service to be available to both engage BIPOC and rural residents and address the grassroots needs of their communities, but on a strategic level we also need national service to be accessible everywhere so that Governors, legislators and other constituents see national service working in their own communities, thereby building a network of support for national service in all parts of the country. We believe in national service. We believe that CNCS and state service commissions have the opportunity to work together to address these concerns and strengthen the national service field. This cooperative effort will ensure that national service programs can be as diverse as our communities and secure the opportunity for every citizen, in every part of the country, to be able to serve.

This white paper outlines barriers in access to national service programming. The primary focus is on the AmeriCorps State program as administered by state service commissions, but there are also comments related to other CNCS programming. Solutions are proposed to address these barriers and expand national service opportunities across the country, to a diverse range of charitable and nonprofit organizations. The solutions identified are labeled as either administrative and regulatory barriers that CNCS can address in the short-term without Congressional action or codified barriers that would require a longer-term legislative resolution. We aimed to provide a high number of administrative/regulatory solutions to show that CNCS has the authority to get started on significant improvements now, but we also included legislative fixes that address particular concerns of our commission and/or our programs. Some solutions are repeated if they would address multiple problems.

Problems & Solutions

1. Problem: Affordability.

Many rural and minority-led or -serving organizations cannot operate an AmeriCorps program at the current cost/MSY and match levels.

Solutions:

- a. Publicize the match waiver and award it to deserving programs; such a waiver is allowed for in CNCS regulations but has not been included in the AmeriCorps State & National Notice of Funding Opportunity (NOFO) for the last 10 years. As recently as 2020 this waiver was offered in the AmeriCorps Tribes NOFO, but other applicants should also be considered for this waiver. For formula applicants, CNCS should take the recommendation of the state service commission as to whether a match waiver should be approved. (Administrative)
- b. Among the flexibilities allowed in making a request for an alternative match schedule, include the option to base the request on more localized data (such as ZIP codes or census tracts) as county-level averages can mask inequities within communities.
- c. Increase CNCS/AmeriCorps allowable funding levels to programs. This should include increasing both the maximum cost/MSY for individual grants and increasing the state portfolio average cost/MSY. At a minimum, CNCS has the discretion to award individual programs at a higher cost/MSY than what it requests of most applicants in its NOFO (as

- CNCS has indicated in recent AmeriCorps Tribes NOFOs) and it could exercise that discretion more broadly to support BIPOC-led/-serving organizations. (Administrative)
- d. Ensure that as administrative requirements are added or changed, the costs of these requirements are factored into the allowable cost/MSY or other funding is provided. For example, changes in guidance regarding evaluation requirements (requiring QED/RCT impact evaluations, requiring approval of evaluation plans) and background checks (encouraging use of the CNCS vendors) have significantly increased program costs for some grantees, without a commensurate increase in funding to programs. (Administrative)
 - e. Improve CNCS’ understanding of the liability burdens placed on grantees, and how those have a financial impact on program sponsors. For example, the recent vendor contracts for NSCHC place liability with the grantee rather than the vendors. On the other hand, the NSCHC disallowances that programs may face can easily bankrupt smaller and less wealthy organizations, leading them to determine that they cannot risk taking on an AmeriCorps program. (Administrative)
 - f. Make sure that cost/MSY increases are allowed for continuation programs, and that the allowable increases take into account other increased costs beyond just required living allowance increases (NSCHC, healthcare, evaluation, etc.). (Administrative)
 - g. Allow Commission Investment Funds to support member development in addition to compliance, in recognition that members from resource-poor backgrounds may need additional support to be successful. (Administrative)
 - h. Make it easier for organizations to use other federal funding as match to AmeriCorps grants not only by working with more federal agencies to generate their pre-approval but also by removing the burden of proof of such allowability from applicants. Requiring written verification from the other federal funder is an unnecessary barrier, and many federal agencies are not responsive even though it is not prohibited by their regulations. (Administrative)
 - i. When federal partners are identified by CNCS to offer funding through the AmeriCorps State and National competition, use the funding from the federal partner as match towards CNCS grant funds to lower or eliminate the match requirement for eligible sponsor organizations. For example, with the Economic Mobility Corps priority our commission identified a qualified applicant serving low-income urban neighborhoods who was interested because they thought that this was how the CDFI/AmeriCorps partnership would work; when they found out they would still have to meet the regular AmeriCorps match requirements out of their own funds they were unable to apply. (Administrative)
 - j. Allow state service commissions to use Commission Investment Funds broadly to not only develop but also support subgrantees that may otherwise lack the capacity to successfully meet all CNCS program requirements. (Administrative)

2. Problem: Competitive Disadvantage.

Organizations serving BIPOC and/or rural populations often have a small scale but broad scope. Such programs face competitive disadvantages due to the current grant thresholds and the evidence and evaluation requirements.

Solutions:

- a. Beyond providing additional pages for the application narratives (for rural intermediary applicants) and a nominally higher cost/MSY (for rural and opportunity youth members), explore other ways to adapt the NOFO criteria to ensure that intermediary and

- rural/underserved urban area programs can successfully compete against single-intervention programs. (Administrative)
- b. Broaden the criteria for demonstrating evidence of program effectiveness. The current evaluation/evidence definitions and requirements limit how small programs can advance through the evidence tiers. For example, the AmeriCorps Youth Launch program that serves some of the highest-poverty counties in Iowa utilizes its own program-designed interventions that it has now evaluated multiple times - but because they are a small local program they can likely never achieve the CNCS “strong” evidence tier, which is based on a national or statewide QED/RCT evaluation. (Administrative)
 - c. Conduct more bundled and/or national level AmeriCorps evaluations as called for in Code and regulations, rather than requiring many small individual grantees to conduct their own evaluations. In particular, CNCS should focus its evaluation efforts on member experience and the value/impact of service for program participants since that is its unique focus as a federal agency and that is its charge per the National and Community Service Act (section 179 g). (Administrative)
 - d. For individual program evaluation requirements, CNCS should follow the regulations (45CFR §2522.710) which refer only to internal versus independent evaluations without the additional requirement of an impact evaluation, defined by CNCS as a randomized control trial or quasi-experimental design. If CNCS still wants certain programs to conduct impact evaluations, it should conduct and pay for them directly or change the threshold for an independent evaluation in regulations to an amount much higher than \$500,000. Even our programs that are below the current threshold have found evaluation costs now consuming significant portions of their budgets, leaving them with fewer dollars to devote to other program objectives such as member development and support. (Administrative and Regulatory)
 - e. Allow for national service fellowships/single placements of AmeriCorps State members through commissions. This concept was included in the Serve America Act as the ServeAmerica Fellowship program and it is included as part of the CORPS Act legislation that has been proposed at the federal level - see bill summary at <https://voicesforservice.org/news/the-corps-act-cultivating-opportunity-and-response-to-the-pandemic-through-service-act/>. (Legislative)
 - f. Continue following Serve America Act requirements by providing a process for commissions to utilize placeholder grants. This allows greater flexibility to award formula grants to organizations who may need more time and support from the commission in order to develop their applications. (Administrative)
 - g. Remove reporting requirements that are duplicative or not meaningful. Commissions are disincentivized from awarding multiple, smaller grants and have less time for supporting those grantees if we must instead be reporting to CNCS/AmeriCorps on information that is already available in CNCS systems. For example, the Past Performance assessment asks commissions to duplicate information on recruitment, retention, and performance measures that is already reported in eGrants, but no longer includes questions and never included the opportunity to comment on strategic factors about a program that may make it an asset or risk to the commission or CNCS/AmeriCorps. (Administrative)

3. Problem: Operational Burden.

Organizations serving BIPOC and/or rural populations often have disproportionately limited access to philanthropic resources and staff capacity. Therefore these organizations are particularly challenged by AmeriCorps requirements that create unnecessary financial or administrative burdens.

Solutions:

- a. Allow programs to begin enrollment, citizenship verification, NSCHC, etc. sooner so that these key requirements can be completed in a timely fashion without overburdening small staff (i.e. do not tie these functions to the timing of the grant award/receipt of a grant number in eGrants). (Administrative)
 - b. Hold members harmless when programs make errors during the enrollment process. Qualified, eligible members should not be penalized through disqualification of their hours or loss/reduction of their education awards for errors made by their programs. CNCS should provide programs a reasonable method to rectify these errors. (Administrative).
 - c. Continue to gather input from the field to improve NSCHC guidance and enforcement such that the primary emphasis is truly on safety and not just on compliance. In particular, CNCS should reserve NSCHC disallowances for instances of ineligible members and not for minor timing or spelling issues that do not put program participants or clients at risk. Also, NSCHC findings should not result in IPERIA findings unless members are found to have been ineligible to serve. And, programs should be able to search approved state and FBI repositories directly, without facing additional scrutiny or different standards than those who use CNCS vendors. (Administrative)
 - d. Negotiate better agreements with CNCS NSCHC vendors such that programs whose members live far from a Livescan site do not face disproportionate costs (to pay for their applicants to drive to a Livescan location) or delays (waiting for fingerprint cards and fingerprint results). (Administrative)
 - e. Improve clarity on grant and program management requirements throughout the CNCS/AmeriCorps website. While it is a great improvement to have an official guidance page where grantees can find all official guidance in one spot, not all of the guidance posted is clear or up to date. Some specific examples that cause confusion are the living allowance and education award amount page which does not meaningfully explain the connection between timing of appropriation and timing of award of the prime grants and how that impacts the award amount for members serving at a particular period of time. (Administrative)
 - f. Improve the quality and timeliness of the CNCS helpdesk responses. Particularly for smaller organizations, the effort to follow up with the helpdesk to get an accurate response is labor-intensive and takes away valuable staff time from other necessary tasks. (Administrative)
 - g. Provide more, up-to-date instructions (with screenshots) for completing core grant applicant and program management functions in the eGrants/MyAmeriCorps system.
4. **Problem: Member Barriers.**

Members from BIPOC and/or rural communities cannot serve due to the financial challenges of getting by on solely the AmeriCorps living allowance, or are deterred by program rules that don't meet their needs.

Solutions:

- a. Increase CNCS/AmeriCorps allowable funding levels to programs. This should include increasing both the maximum cost/MSY for individual grants and increasing the state portfolio average cost/MSY. At a minimum, CNCS has the discretion to award individual programs at a higher cost/MSY than what it requests of most applicants in its NOFO (as CNCS has indicated in recent AmeriCorps Tribes NOFOs) and it could exercise that discretion more broadly to support BIPOC-led/-serving organizations. (Administrative)

- b. Provide a waiver to the four-term limit, particularly for members serving in less than full-time terms. Members who must hold down a job in addition to serving in AmeriCorps are more likely to serve part-time and thus max out their number of AmeriCorps terms before earning the maximum value of two full-time education awards. In Iowa, several of our programs that target minority youth as members engage them in MT terms (over the summer or during the college academic year), but their efforts to build these young peoples' civic engagement can actually prevent those individuals from serving FT terms later. (Administrative)
- c. As noted in the Operational Burden section, CNCS should hold members harmless when programs make errors during the enrollment process. Qualified, eligible members should not be penalized through disqualification of their hours or loss/reduction of their education awards for errors made by their programs. CNCS should provide programs a reasonable method to rectify these errors. (Administrative)
- d. Ensure that the process for verifying eligibility manually (by providing copies of birth certificates, social security cards, etc.) is clear and that submitted documents are reviewed quickly. It is difficult for anyone, let alone a low-income individual, to spend an extensive period of time in limbo waiting to start the program and receive a living allowance payment. (Administrative)
- e. Make changes to standardized member forms to be more inclusive and welcoming to diverse populations, particularly regarding questions about gender identity and disability. For example, see the feedback that was previously provided through public comment on recent versions of the member enrollment/exit forms. (Administrative)
- f. CNCS should provide better clarity to programs on how they can access funds to provide reasonable accommodations for AmeriCorps members with disabilities. (Administrative)
- g. Increase accessibility to the AmeriCorps childcare benefit. In particular, CNCS should remove the ban on utilizing otherwise-eligible childcare providers who are part of the member's household. This does not correspond with CNCS regulations about eligible providers, which point back to the state childcare laws. In Iowa, this prohibition is currently disadvantaging members who come from refugee or immigrant households in which multiple generations and/or multiple families live together, compared to white families in which a relative providing care can be reimbursed because he/she does not live with the member. If those members take a low-wage job instead, their household members can be reimbursed as childcare providers under our state program. (Administrative & possibly Regulatory)
- h. CNCS should clarify and/or change past guidance to allow programs to provide additional benefits such as housing stipends, relocation/settling-in allowances (similar to AmeriCorps VISTA), and emergency expense allowances (also similar to VISTA) without having those considered part of the living allowance. This would allow programs with the financial means or with willing partners to provide this additional support and still increase the living allowance. (Administrative & possibly Regulatory)
- i. Focus the CNCS research and evaluation agenda and requirements on service itself. In particular, the agency should focus on how to make its programs accessible and welcoming to a diverse range of participants and how to provide a positive and impactful member service experience to all. Current requirements focus on specific issues areas for which others have more expertise and should drive the research agenda, whereas CNCS is the federal agency uniquely positioned to focus on service. In particular, the National and Community Service Act instructs CNCS to evaluate whether programs are recruiting and enrolling diverse participants and whether receipt of the education awards is helping to reduce student loan debt. (Administrative)

- j. Make available state-level member demographic data so that both CNCS and the state service commissions can assess their progress in recruiting and enrolling a diverse service corps. The National and Community Service Act (Section 179 i) directs CNCS to have such an evaluation conducted each year, with results provided to commissions. (Administrative)
- k. Follow statute by appropriately investing in the Volunteering and Civic Life in America survey and related analysis in order to collect and disseminate information on community volunteers. Not having access to usable data from this survey means we don't have demographic data to use as a baseline regarding who is volunteering in Iowa (our [public comment](#) and [letter to OMB](#)). (Administrative)
- l. Broaden the rules around who can transfer and who can receive a transferred education award (in terms of age, timeline, including VISTA), and discontinue the practice of counting a received award towards the limits on the award value an individual can earn. In the meantime, CNCS could make it easier for individuals to request an extension to the time period allowed to utilize a transferred award. The current requirements cause confusion because of the discrepancy between AmeriCorps State/National and VISTA, and limit the incentive that the education award provides. (Legislative)
- m. Allow AmeriCorps State & National members to select an end-of-service cash stipend instead of an education award, similar to AmeriCorps VISTA members. (Legislative)
- n. Exempt the AmeriCorps education award from federal taxes, similar to other educational scholarships and fellowships. While working towards this change or if it cannot be approved, withhold the taxable amount from the award when it is distributed so that alumni do not face large tax bills for using their awards. (Legislative)
- o. Allow individuals with additional legal citizenship & immigration statuses, including DACA, TPS, refugee, asylee, and compact free association non-immigrants, to serve as AmeriCorps State & National members. (Legislative)
- p. For AmeriCorps VISTA members, CNCS should provide clear guidance to state Medicaid programs regarding the income disregard rule to ensure that member eligibility is calculated correctly. Volunteer Iowa had to work with CNCS legal counsel to advise Iowa's Medicaid program staff that they were not interpreting the law correctly but we are unaware how many Iowa AmeriCorps VISTA members may have been or may still be impacted. (Administrative)
- q. Also for AmeriCorps VISTA, offer the Virtual Member Orientation (VMO) on a more frequent basis in order to reduce the gap between member acceptance of a position and member start date. Currently many of our AmeriCorps VISTA members must wait a month or more to start their position from the time they are selected and that is a barrier for individuals without savings or assistance to cover their expenses in that gap period. (Administrative)