

AmeriCorps Grants Missing Required Special Timekeeping Conditions

Closed 09/30/2024

The AmeriCorps Office of Inspector General (AmeriCorps OIG) investigated allegations that The New Teacher Project (TNTP), New York, NY, improperly exited five AmeriCorps members (members) with 1700 hours and thus certified full time education awards for the members, despite previous denials from AmeriCorps State and National to TNTP's request to retroactively backdate the members' enrollment in the MyAmeriCorps Portal.

AmeriCorps OIG's investigation substantiated the allegations. ASN denied TNTP's request to retroactively backdate the members' enrollment. The investigation further determined that AmeriCorps resolved the issue with TNTP when they requested and received payment for the inappropriately disbursed portion of the funds.

The investigation also uncovered that TNTP did not keep timesheets, as it relied on a timekeeping waiver approved by AmeriCorps in 2008. The waiver allowed TNTP to follow the timekeeping practices of its profession. The investigation determined TNTP followed the correct process at the time to request the waiver, and that TNTP continued to rely on the 2008 waiver. However, while attempting to identify if the alternative timekeeping approval was still in effect, AmeriCorps personnel stated it may not be sufficient. Internal AmeriCorps guidance explained an alternative timekeeping approval is documented via a special condition on the grant. However, a special condition was not noted on TNTP's past two grants.

AmeriCorps OIG sent a Report of Investigation (ROI) to AmeriCorps recommending that AmeriCorps (1) determine whether TNTP's use of the 2008 timekeeping approval was still in effect and if so, why a waiver was not included as a special condition on the recent grants; (2) determine whether TNTP's alternative timekeeping procedure complied with the Uniform Guidance; and, (3) determine the number of grantees relying on alternative timekeeping approvals, confirm that each is following the proper request and approval process and if approvals are listed under the special conditions on the notices of grant award.

Agency/Administrative Actions

AmeriCorps responded that it did not find anything related to alternative timekeeping for one of TNTP's grants and, subsequently, added the special timekeeping condition to TNTP's active grant. AmeriCorps did not believe it was appropriate to disallow costs associated with the grant that was missing the special timekeeping condition because it would have approved the alternative timekeeping process had TNTP requested it, and believed the error was administrative in nature concerning how to document compliance of an otherwise compliant activity. The alternative timekeeping process complied with the Uniform Guidance. Finally, AmeriCorps reviewed other active grants and subgrants that may have required special timekeeping conditions and identified eight that were missing such conditions and added the requisite conditions.

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