

AmeriCorps to Consider Implementing Future IT System Controls Related to Members Enrolled in Multiple, Concurrent Programs

Closed 09/30/2024

Following the receipt of a complaint that an AmeriCorps member was simultaneously enrolled in two AmeriCorps programs at different grantees without the grantees' knowledge, AmeriCorps Office of Inspector General (AmeriCorps OIG) initiated a proactive review of members with multiple service terms during the same timeframe.

An initial query of data covering 2016 to 2023 held in AmeriCorps systems identified 14 members with overlapping service terms. A more detailed review of those 14 members found three of the members had service terms who appeared to be simultaneously enrolled in two full-time programs for some period of time.

AmeriCorps OIG issued a Request for Management Action (RMA) to AmeriCorps to address the three individual instances of overlapping service terms identified during the initial review of data. The RMA suggested that AmeriCorps obtain and review member files and time and attendance records associated with the members, and if funds were disbursed to any of those members in error, to disallow associated costs.

AmeriCorps OIG separately issued a Report of Investigation (ROI) recommending that AmeriCorps: (1) implement a control in the My AmeriCorps Portal / eGrants that prevents greater than the equivalent of full-time enrollment or alerts relevant grantees in such a scenario; and (2) update the member handbook and grant terms and conditions to clearly state that members cannot serve more than the equivalent of a full-time term at any given time.

Agency/Administrative Actions

In response to the RMA, AmeriCorps wrote that it reviewed and analyzed relevant records and believed that two of the three members in question had accidental record duplications in eGrants that caused it to appear that the members had overlapping service terms when they did not. The third member in question served a full-time term and a part-time term that overlapped for a period. AmeriCorps stated that while there was some overlap, there is no prohibition within AmeriCorps State & National against members serving concurrent terms. As a result, AmeriCorps did not believe any funds were disbursed in error and in need of disallowance.

AmeriCorps responded to the ROI, confirming that legacy systems lack indicators that notify staff or grantees and sponsors when an individual may have overlapping dates related to multiple terms of service within the same AmeriCorps program type or, if individuals serving in multiple cooccurring terms of service are receiving living allowance payments and education awards beyond allowable limits. The AmeriCorps Modernization Team intends to design features in future systems to support identity resolution and identification of scenarios that increase the likelihood of fraud or noncompliance, such as including automatic flags or system notifications

when an individual is enrolled in multiple, concurrent programs. Such functionalities will be considered in the development of future systems based on the level of effort required and competing priorities.

AmeriCorps noted that individuals may serve multiple terms across programs within established limitations. AmeriCorps VISTA does not allow individuals to serve two terms at once and ASN programs have no prohibition of serving concurrent terms beyond a full-time equivalent. As such, AmeriCorps does not intend to modify Terms and Conditions.

Case ID 2022-127