## AmeriCorps Disallows Living Allowances Paid to Members Before They Were Enrolled in the My AmeriCorps Portal

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The AmeriCorps Office of Inspector General (AmeriCorps OIG) investigated allegations that Movement of Youth (MOY), located in Durham, NC, improperly paid living allowances to AmeriCorps members before they were enrolled into the My AmeriCorps Portal and the AmeriCorps grants management system (eGrants).

The investigation determined that MOY (1) improperly paid \$1,000 lump sum living allowances to 19 members for service performed before they were enrolled into the Portal/eGrants; (2) improperly paid members different living allowance rates; (3) paid living allowances to members who performed little or no service; (4) utilized two Volunteers in Service to America (VISTA) members serving through the North Carolina College Compact (NC-CC) to help manage MOY's AmeriCorps program; (5) improperly paid two VISTA members a salary in addition to their VISTA living allowance; (6) did not appear to have the knowledge, staff, or financial resources to effectively operate an AmeriCorps program; and (7) directed members not to cooperate with the OIG investigation.

AmeriCorps OIG made 11 recommendations to AmeriCorps including recommending that AmeriCorps disallow living allowance and education awards improperly paid to members, disallow living allowance for the two VISTA members who were managing the MOY AmeriCorps program and paid a salary in addition to their VISTA living allowance, update the Terms and Conditions of the AmeriCorps State and National (ASN) grants to include clear and unambiguous guidance explaining when it is appropriate to pay or withhold living allowance, conduct courtesy site visits of new grantees, and require all VISTA sponsors to provide a copy of the Cost Share memorandum of agreement to their host sites.

AmeriCorps concurred or partially concurred with four of OIG's 11 recommendations. AmeriCorps disallowed \$21,142.88 improperly paid to members, agreed to modify future VISTA memoranda of agreement (MOA) to ensure sponsors provide host sites with a copy of the general provisions of their cost share MOAs, and the state service commission confirmed that it made significant updates to its training materials and program monitoring.

AmeriCorps did not disallow the living allowance paid to 13 members who served 51 hours or less because there is not a statute, regulation, or policy stating that members must serve a certain number of hours to receive the allowance. AmeriCorps did not want to specify in its Terms and Conditions how many days of consecutive member absence would trigger a pause in living allowance payments because it claimed that it could be seen as government overreach. Other recommendations with which AmeriCorps did not concur included the recommendation to perform site visits of new grantees. AmeriCorps responded that it uses a risk-based monitoring plan to determine when grantees should be inspected. AmeriCorps also declined to disallow the living allowance for MOY's two VISTA members. AmeriCorps responded that its regulations do

not specifically prohibit VISTA members from supporting AmeriCorps programs and since the VISTA members did not perform any data entry, they were not technically managing the members.

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