

SEMIANNUAL REPORT TO CONGRESS

OCTOBER 1, 2024 -
MARCH 31, 2025





SEMIANNUAL REPORT SUMMARY

OCTOBER 1, 2024 - MARCH 31, 2025

AmeriCorps OIG plays a crucial role in protecting the integrity of national and community service. We do this by delivering independent oversight, identifying and mitigating risks and vulnerabilities, and promoting accountability and integrity throughout AmeriCorps' diverse programs and operations. Our commitment to objective oversight is evident in all our work. The accomplishments in this semiannual report are a testament to our staff's talent and dedication to our mission. We remain committed to partnering with stakeholders to safeguard and oversee AmeriCorps, ensuring its positive impact continues for communities nationwide.

OUR VISION

To be a catalyst for continuous improvement through objective, innovative and trusted oversight.

AUDIT STATISTICS

\$0

Monetary
Impact



16

Recommendations for
Corrective Action



3

Mandatory Audit
Reports Issued



0

Performance Audit
Reports Issued



1

Management Alerts
Issued



INVESTIGATIVE STATISTICS

\$252K

Monetary
Impact



16

Active Cases
with the Department
of Justice



8

Suspension/Debarment
Recommendations
to Agency



1/4

Indictments/
Convictions



1/0

Department of
Justice Referrals
(Accepted/Declined)



OPEN RECOMMENDATIONS

174

Recommendations
not fully implemented
as of March 31, 2025



22

Unresolved
Recommendations
included in Open
Recommendations



INVESTIGATIVE CASE STATISTICS

Cases Active at
Beginning of Period:

80

Cases Opened this Period:

18

Cases Closed this Period:

28

Cases Active at
End of Period:

70

OUTREACH HIGHLIGHTS

PUBLICATIONS

Anti-Fraud Advisories

- Vol. 5: What are Prohibited or Unallowable Activities?

IN-PERSON ENGAGEMENT

State Commissions
Visited
this Period

7

Other Meetings and
Anti-Fraud Trainings
this Period

6

OIG DISALLOWANCES

Activities rooted in one semiannual period
can bear fruit in a subsequent period.

AUDITS

AmeriCorps took action to disallow or
transfer liability of **79%** of the \$9,084,468
in monetary impact identified in OIG
recommendations from three audit reports
in FY 2024:

\$3,655,413: Disallowed Federal Funds

\$2,132,194: Disallowed Match Costs



\$1,364,667: Funds Put to Better Use

INVESTIGATIONS

This period, AmeriCorps took action to
recover **74%** of the \$978,249 in disallowances
recommended in prior Reports of
Investigations.

\$720,299: Disallowed Federal Funds

AT A GLANCE

	FY 2025 FTEs	FY 2025 Budget
 OIG	29	\$7.595M
 AmeriCorps	700*	\$1.262B

**This number is approximate based on representations made by AmeriCorps personnel.*

ABOUT AMERICORPS

AmeriCorps provides grants and technical assistance to volunteer organizations throughout the United States to strengthen communities, foster civic engagement, and improve the lives of all Americans serving their local communities and the Nation.¹ In Fiscal Year (FY) 2024, AmeriCorps invested approximately \$970 million in national service through its programs: AmeriCorps State and National (ASN), Volunteers in Service to America (VISTA), the National Civilian Community Corps (NCCC), AmeriCorps Seniors, and Public Health AmeriCorps. A substantial portion of these funds were distributed through service commissions in each U.S. State and Territory.

OFFICE OF INSPECTOR GENERAL

Along with AmeriCorps, Congress established the AmeriCorps Office of Inspector General (AmeriCorps OIG) to promote economy, efficiency, and effectiveness in AmeriCorps' programs and operations and to prevent and detect fraud, waste, and abuse within AmeriCorps or the entities that receive and distribute AmeriCorps funds.² AmeriCorps OIG is an independent organization, led by a Presidential appointee, which submits its reports and recommendations to AmeriCorps' Chief Executive Officer and Congress.

The results of our work are intended to motivate AmeriCorps to take corrective action and prevent wrongdoing and mismanagement in the execution of programs. We also conduct outreach to our stakeholders, including our grant recipients, to make them aware of fraud red flags, the consequences of wrongdoing, whistleblower protection, and how to report problems or concerns to us. Additionally, we recommend that AmeriCorps suspend and/or debar recipients and potential recipients of AmeriCorps funds—both individuals and organizations—that are not presently responsible to administer Federal funds. These recommendations protect the government and, ultimately, the taxpayers, by preventing wrongdoers or those with a history of poor performance or noncompliance from receiving new Federal awards.

¹ In September 2020, the Corporation for National and Community Service (CNCS) began doing business as AmeriCorps.

² In February 2021, CNCS Office of Inspector General (OIG) changed its name to AmeriCorps OIG.

Our Mission

To protect the integrity of national and community service by providing independent oversight, identifying and mitigating risks and vulnerabilities, and promoting accountability and integrity in AmeriCorps' management, programs and operations.

Our Vision

To be a catalyst for continuous improvement through objective, innovative and trusted oversight.

Our Values

Integrity

We are fair and transparent in our independent oversight.

Collaboration

We promote an inclusive culture that encourages teamwork.

Accountability

We hold ourselves responsible for delivering high-quality results.

Respect

We embrace the ideas and individuality of those we encounter in our work.

Excellence

We produce exceptional and impactful work products.

Top Management Challenges

AmeriCorps programs offer help and hope to communities, and the agency is uniquely positioned to lift communities and offer critical services to children, young adults, and older adults who need them most. This is a critical time for AmeriCorps' leadership to reflect on where the organization stands, take steps that will successfully address longstanding issues, achieve significant improvements that strengthen the organization and ensure the effective stewardship of U.S. funds dedicated to national and community service. The three issues our office has identified and is working with AmeriCorps to strengthen are:

- Improving Financial Management
- Prioritizing Grant Fraud Prevention and Detection in its Programs
- Modernizing and Securing Information Technology

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MESSAGE FROM THE ACTING INSPECTOR GENERAL

It is my pleasure to submit this Semiannual Report for the period of October 1, 2024, through March 31, 2025. Despite unprecedented challenges facing the Inspector General community during this reporting period, our oversight work continued with determination and resolve.

This period, we were not able to carry out the full scope of audits of AmeriCorps grant programs that we typically conduct to meet our statutory mandate under the Inspector General Act of 1978. Although we had Congressional funding available, human resources issues and the hiring freeze prevented the backfilling of two key auditor positions. Consequently, the Office of Audits could staff any new risk-based performance audits focusing on how our grantees are spending AmeriCorps funds. Our inability to backfill these positions resulted in reduced agency cost savings and efficiency, and the inability to hold grantees accountable and protect our communities. This is not just a loss in accountability—it is a loss felt by taxpayers, as well as the communities and the younger and older Americans that AmeriCorps is meant to serve.

While the Office of Inspector General has the authority to conduct audits and investigations and make recommendations, we do not have the ability to recoup funds ourselves. That responsibility rests with the agency. Therefore, AmeriCorps OIG devotes significant effort to advocating for the acceptance and



implementation of our recommendations through oral briefings, dialogue, and evidence-based discussions. These efforts bore fruit in FY 2024. AmeriCorps agreed to disallow and recoup \$5.7 million in questioned costs and to withhold the transfer of \$1.3 million in improperly earned Education Awards—returning or preventing the misuse of \$7 million in federal funds. While AmeriCorps opted not to pursue recovery of the

additional funds identified through our audits, the outcome nevertheless affirms the critical value of our oversight efforts and the necessity of sustained engagement with agency leadership to strengthen accountability and performance.

At the conclusion of this reporting period, AmeriCorps had 174 open recommendations. Our Office of Audits remains focused on the critical work of following up on and supporting the implementation of these recommendations. AmeriCorps and our audit team successfully closed 58 recommendations this period. While this is fewer than the 69 recommendations closed during the previous period, it nonetheless demonstrates the continued commitment by both organizations to strengthening AmeriCorps programs and operations. We appreciate the agency's engagement in addressing our outstanding recommendations and for their willingness to work with our office to enhance accountability.

Our Office of Investigations also focused on making a meaningful impact in communities

across the country. This reporting period saw the conclusion of several significant investigations, resulting in criminal convictions for public corruption, grant fraud, and misuse of pandemic-related funding. Notably, four individuals were convicted, with one still awaiting sentencing. In one case, a former employee of a Chicago-area AmeriCorps grantee pleaded guilty to two counts of conspiracy to commit wire fraud. The individual admitted to causing more than \$1 million in losses to an AmeriCorps program and an Indiana school system and will be sentenced at a later date.

In addition, we made significant strides in our administrative investigations. AmeriCorps acted on 74 percent of the Office of Investigation's administrative recommendations made this period, resulting in approximately \$720,300 in recoveries. However, AmeriCorps declined to recover an additional \$258,000 in AmeriCorps funds recommended for recovery by the OIG. This discrepancy reflects a continuing gap between the findings of our investigations and the agency's willingness to fully implement our recommendations and ensure that AmeriCorps funds are benefiting communities.

Finally, AmeriCorps OIG issued its second Management Alert since 2019. The Alert raises concerns that more than \$144 million in ARP funds are at risk of having been obligated after Congress rescinded them. AmeriCorps contends that the funds were properly obligated when the CEO certified the award package. However, our review found that the certification dates were not recorded in AmeriCorps' systems nor clearly supported by agency policy or documentation, leaving the agency unable to accurately verify the status of the funds. The Alert suggested that AmeriCorps seek a formal opinion from the Government Accountability Office, the experts on appropriations law, but AmeriCorps declined.

I am grateful to work with colleagues who are dedicated to the OIG's mission and who value the work of AmeriCorps. We are committed to independent and objective oversight of AmeriCorps programs and operations. Our success period after period is only possible because of AmeriCorps OIG's talented staff.

We continue to work collaboratively with our partners and stakeholders to protect and oversee AmeriCorps programs and operations. We remain steadfast in our commitment to ensuring that AmeriCorps funds are used effectively, efficiently, and in accordance with the law to serve communities across the nation.



Stephen Ravas

Acting Inspector General

OFFICE OF AUDITS

Statistical Highlights: October 1, 2024 – March 31, 2025


Monetary Impact
this Period
\$0


Recommendations Made
this Period
16


Reports Issued
this Period
4

Highlights of Audit Work Completed During this Reporting Period



Fiscal Year 2024 Federal Information Security Modernization Act (FISMA) Audit

The Federal Information Security Modernization Act of 2014 (FISMA)³ requires Federal agencies to have an annual independent audit of their information security program and practices to be performed by the Inspector General or an independent external auditor. The objective of this audit was to determine the effectiveness of AmeriCorps' information security program and practices for the period August 1, 2023, through July 31, 2024, and report the results to the Office of Management and Budget (OMB).

Independent external auditors evaluated the effectiveness of AmeriCorps' information security program in accordance with FISMA, OMB requirements, and guidance from the National Institute of Standards and Technology. The auditors' assessment was based on the objective metrics prescribed by the Department of Homeland Security, which evaluate information security programs on a maturity scale from Level 1 (*Ad Hoc*) to Level 5 (*Optimized*) in nine FISMA metric domains and five security function areas. A functional information security area is not considered effective unless it achieves a rating of at least *Managed and Measurable* (Level 4). Auditors determined AmeriCorps' information security program improved overall but is still considered not effective with an overall maturity rating of *Consistently Implemented* (Level 3).

AmeriCorps made considerable progress in implementing prior year recommendations. AmeriCorps successfully resolved 19 of the 29 prior open recommendations. Our FY 2024 report issued three new recommendations that will assist AmeriCorps in progressing to the next maturity level and establishing an effective information security program.

Audit of AmeriCorps' Fiscal Year 2024 Consolidated Financial Statements and Audit of AmeriCorps' Fiscal Year 2024 National Service Trust Financial Statements

The AmeriCorps Office of Inspector General (OIG) contracted with an independent certified public accounting firm to audit AmeriCorps' consolidated financial statements and AmeriCorps' National Service Trust financial statements (Trust financial statements) (collectively, "the Financial Statements Audit") for the fiscal year that ended September 30, 2024. The objective of the Financial Statements Audit is to express an opinion on whether AmeriCorps' FY 2024 financial statements are fairly presented in all

³ Public Law (P.L.) 113-283, Federal Information Security Modernization Act of 2014, December 18, 2014.

material respects; report on internal controls over financial reporting; and report on compliance with the provisions of laws, regulations, contracts, and grant agreements. The audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS) and Office of Management and Budget Bulletin No. 24-02, Audit Requirements for Federal Financial Statements.

The auditors issued a disclaimer of opinion. AmeriCorps could not provide sufficient appropriate evidential matter in a timely manner to support the amounts in the consolidated financial statements or the Trust financial statements and had inadequate processes, controls, and records to support transaction and account balances. As a result, the auditors could not determine the effect of the lack of sufficient appropriate audit evidence on AmeriCorps' consolidated financial statements or the Trust financial statements as of and for the years ending September 30, 2024 and September 30, 2023. Due to these limitations, the auditors were not able to perform the required tests of controls and compliance. Furthermore, the consolidated financial statements and the Trust financial statements and accompanying notes as of and for the years ending September 30, 2024 and September 30, 2023, were not in compliance with the Office of Management and Budget (OMB) Circular No. A-136, Financial Reporting Requirements, (OMB A-136), and had mathematical errors and inconsistencies.

The FY 2024 Financial Statements Audit reported 11 recurring material weaknesses and two significant deficiencies. AmeriCorps began the FY 2024 Financial Statements Audit with 95 unimplemented recommendations for the consolidated financial statement audit and the Trust audit with 46 unimplemented recommendations. Remedial actions by AmeriCorps closed 20 (consolidated) and 16 (Trust) of those recommendations in FY 2024. The auditors also issued three new recommendations and eight modified repeat recommendations⁴ for the consolidated audit, for an outstanding total of 77 consolidated recommendations. The auditors issued three new recommendations and six modified repeat recommendations⁵ for the Trust audit, for an outstanding total of 32 Trust recommendations.⁶

Management Alert: Concerns Regarding the Obligation of Rescinded Pandemic Funds and Grant Process Documentation

In early 2021, AmeriCorps received \$1 billion in supplemental funding under the American Rescue Plan (ARP) primarily to award grants in support of its programs. These funds were to remain available until September 30, 2024. On June 3, 2023, however, Congress rescinded all unobligated AmeriCorps ARP program funds. As part of our oversight of ARP funds, we identified more than 100 Notices of Grant Award involving ARP funds issued after June 3, 2023. AmeriCorps' position is that these grants could still be awarded because they were obligated prior to the rescission when the CEO certified the award package containing the grants. However, we found the certification dates were not recorded in AmeriCorps' systems or clearly articulated in its policies and procedures, resulting in AmeriCorps' inability to accurately determine the status of funds. Our review also determined that Federal appropriation law, relevant

⁴ These eight modified repeat recommendations superseded nine recommendations previously listed as overdue related to the consolidated financial statements.

⁵ These six modified repeat recommendations superseded seven recommendations previously listed as overdue related to the Trust financial statements.

⁶ The Financial Statements Audit was the subject of a hearing before the House Committee on Education and the Workforce, Subcommittee on Education and Workforce Training, United States House of Representatives, "Examining the Policies and Priorities of AmeriCorps and Its FY 2024 Audit Failure," on December 11, 2024.

precedent, and AmeriCorps' own accounting treatment of when grant funds are obligated raise concerns that more than \$144 million in ARP funds are at risk of having been obligated after they were rescinded by Congress. This alert highlighted the need for AmeriCorps to seek a formal opinion from the Government Accountability Office (GAO) regarding whether AmeriCorps obligated rescinded ARP funds and to improve its policies, documentation, and recording of all key steps in its grant award process. AmeriCorps declined to seek a formal GAO opinion.

Audit Resolution

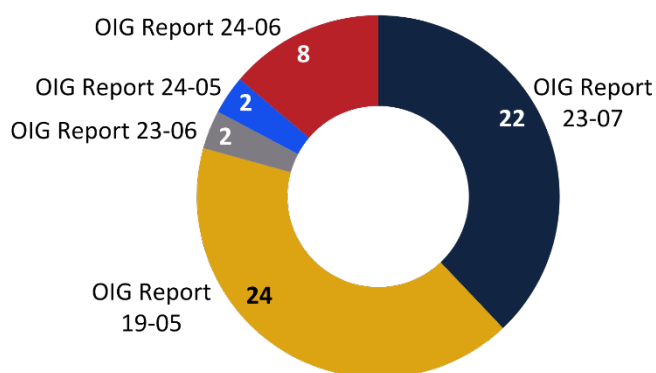
In alignment with our strategic plan, we have strengthened our engagement with AmeriCorps to address and resolve outstanding recommendations from prior audits. These efforts aim to enhance operational efficiency, strengthen internal controls, recover questioned costs, and ensure federal funds are used more effectively. As a result of this collaborative work, 58 recommendations were successfully closed during this semiannual period. We continue to report all unimplemented, prior period recommendations as open.



To address open recommendations, AmeriCorps submits a corrective action plan to the OIG approximately six months after each final report is issued. These plans outline proposed actions and target completion dates. We review the plans and engage with AmeriCorps to ensure the corrective measures are timely, appropriate, and fully responsive to the report's recommendations. Once AmeriCorps completes its proposed actions, it provides a notice of final action to document implementation. Upon verifying that the corrective actions have been fully executed, we formally close the recommendation. If AmeriCorps either fails to implement the recommendation or declines to do so in full, we classify the recommendation as "unresolved."

AmeriCorps Implemented Corrective Actions on Approximately 25 Percent of Prior Period Open Recommendations

Figure 1: Closed 58 Recommendations



During this semiannual period, we closed 58 recommendations based on AmeriCorps' submissions to demonstrate corrective action as noted in Figure 1. The 58 closed recommendations represent a significant portion—25%—of the 230 open recommendations at the end of the prior semiannual period. This shows significant progress, in line with our strategic plan, towards engaging AmeriCorps to resolve prior findings to

improve operations and internal controls, and recover questioned costs and funds put to better use.

AmeriCorps' Office of Audit and Debt Resolution (OADR) was instrumental in working with grantees to close the 58 recommendations, as shown in Figure 1.

AmeriCorps Agreed to Disallow \$7,152,274 in Questioned Costs and Funds Put to Better Use

As a result of audit resolution activities this semiannual period, AmeriCorps clawed back \$3,655,413 of federal funds, disallowed \$2,132,194 in questioned match costs and transferred liability to the grantee for \$1,364,667 of funds put to better use due to recommendations in three OIG audit reports issued in FY 2024.

The audit reports identified questioned costs and recommended that AmeriCorps recover those costs. AmeriCorps agreed to disallow and recover the costs, issuing debt collection notices to the Puerto Rico Commission totaling \$625,446 and to Serve DC totaling \$1,766,876. In addition, our audit report on AmeriCorps grants awarded to YouthBuild USA identified \$3,604,355 in questioned costs and \$3,087,791 in funds put to better use. For this audit, in addition to recommending that AmeriCorps recover the questioned costs, we also recommended that AmeriCorps hold the grantee accountable for the funds put to better use. While AmeriCorps did not agree to implement all of the recommendations made in this audit, it agreed to disallow and recover \$3,395,285 in questioned costs and \$1,364,667 in funds put to better use.

Audit Statistical and Summary Tables

The statistical and summary tables in this section were submitted in compliance with the requirements enumerated in the Inspector General Act of 1978, as amended.

Figure 2: Office of Audits Issued Reports This Period

Report Number Issued	Report Name	Dollars Questioned	Dollars Unsupported ⁷	Funds Put to Better Use
OIG-AR-24-03	FY 2024 Federal Information Security Modernization Act (FISMA) Audit	\$0	\$0	\$0
OIG-AR-25-01	Audit of AmeriCorps' FY 2024 Consolidated Financial Statements	\$0	\$0	\$0
OIG-AR-25-02	Audit of AmeriCorps' FY 2024 National Service Trust Financial Statements	\$0	\$0	\$0
OIG-MA-25-05	Management Alert: Concerns Regarding the Obligation of Rescinded Pandemic Funds and	\$0	\$0	\$0

⁷ Amounts included in Dollars Unsupported are a portion of the amounts listed in Dollars Questioned.

Report Number Issued	Report Name	Dollars Questioned	Dollars Unsupported ⁷	Funds Put to Better Use
	Grant Process Documentation			
	TOTAL	\$0	\$0	\$0

Figure 3: Office of Audits Reports with Questioned and Unsupported Costs

Report Category		Number of Reports	Questioned Costs	Unsupported Costs ⁸
A.	Reports containing questioned and unsupported costs for which no management decision had been made by the end of the prior reporting period (A1 through A3)	3	\$5,996,677	\$458,681
A1	<i>AmeriCorps Grants Awarded to the Puerto Rico Commission, 23-07</i>		\$625,446	\$61,029
A2	<i>AmeriCorps Grants Awarded to YouthBuild, 24-05</i>		\$3,604,355	\$0
A3	<i>AmeriCorps Grants Awarded to Serve DC, 24-06</i>		\$1,766,876	\$397,652
B.	Reports issued during the current reporting period with questioned and unsupported costs	0	\$0	\$0
	Subtotal Reports (A plus B)	3	\$5,996,677	\$458,681
C.	Reports for which a management decision on questioned and unsupported costs was made during the current reporting period: <i>AmeriCorps Grants Awarded to the Puerto Rico Commission, 23-07; AmeriCorps Grants Awarded to YouthBuild, 24-05; AmeriCorps Grants Awarded to Serve DC, 24-06</i>	3	\$5,996,677	\$458,681
C1	Value of disallowed questioned and unsupported costs		\$5,787,607	\$458,681
C2	Value of questioned and unsupported costs not disallowed.		\$209,070	\$0

⁸ Amounts included in Unsupported Costs are a portion of the amounts listed in Questioned Costs.

Report Category		Number of Reports	Questioned Costs	Unsupported Costs ⁸
D.	Total reports for which no final action on questioned and unsupported costs had been made by the end of the current reporting period	0	\$0	\$0

Figure 4: Office of Audits Reports with Funds Put to Better Use

Report Category		Number of Reports	Funds Put to Better Use
A.	Reports containing funds put to better use for which no management decision had been made by the end of the prior reporting period: <i>Audit of AmeriCorps Grants Awarded to YouthBuild USA</i>	1	\$3,087,791
B.	Reports issued during the current reporting period with funds put to better use	0	\$0
Subtotal Reports (A plus B)		1	\$3,087,791
C.	Reports for which a management decision on funds put to better use was made during the current reporting period	1	\$3,087,791
	i. Value of disallowed funds put to better use.	0	\$1,364,667
	ii. Value of funds put to better use not disallowed	0	\$1,723,124
D.	Total Reports for which no management decision on funds put to better use had been made by the end of the current reporting period	0	\$0

Figure 5: Overdue Management Decisions

Report Number	Title	Questioned Costs	Funds Put to Better Use	Management Decision Due	Status at End of Reporting Period
N/A	N/A	\$0	\$0	N/A	N/A
	Total	\$0	\$0		

Figure 6: Reports Without Final Action

Report Number	Title	Date Issued	Final Action Due
N/A	N/A	N/A	N/A

OFFICE OF INVESTIGATIONS



The Office of Investigations is responsible for the detection and investigation of fraud, waste, and abuse in AmeriCorps programs and operations. Special Agents probe allegations of serious—sometimes criminal—misconduct involving AmeriCorps employees, contractors, and grant and subgrant recipients that threaten the integrity of AmeriCorps service initiatives. We refer criminal and civil matters to the appropriate U.S. Attorney’s Office (USAOs) or to local district attorneys for prosecution and monetary recovery. Substantiated matters that are not accepted for prosecution or civil enforcement are referred to AmeriCorps management for informational purposes or administrative action, which may include recommendations for disallowances, recoveries of grant funds, and government-wide [suspension and debarment](#) to protect the Federal government from those who have demonstrated that they are not presently responsible stewards of Federal funds.

Figure 7: 16 Active Cases with the Department of Justice



Figure 8: Hotline Complaint Statistics^{9,10,11}



⁹ Three investigations were opened that had no associated complaint (either proactive, or spinoffs of existing investigations).

¹⁰ Approximately 12 percent of Hotline Complaints received resulted in cases being opened.

¹¹ AmeriCorps OIG receives a large number hotline complaints focused on the programmatic or management elements of AmeriCorps grants. When these complaints do not include reasonable suspicion of fraud, waste, or abuse, or do not meet other thresholds, the Office of Investigations refers the matter to AmeriCorps Management.

Overview

We primarily focused our investigative resources on six areas of fraud, waste, and abuse that undermine the mission and the integrity of national service:

1. Theft and embezzlement from Federal programs for personal use;
2. Identity theft or misuse of identities to divert AmeriCorps living allowances and other benefits;
3. Fabrication or alteration of required criminal history checks, which jeopardize the safety of those benefitting from national service;
4. Fraud schemes involving pandemic funding;
5. Falsification of volunteer, member, and grant-funded staff time records, which deprives beneficiaries of needed community service, defrauds the public, and misdirects Federal funds; and
6. Diversion of AmeriCorps funds towards unauthorized and unallowable expenses, including personal enrichment.



Four of our criminal cases reached plea agreements or the sentencing stage during this reporting period. Together, these cases highlight several of our focus areas of fraud, waste, and abuse noted above. These cases included intentional misrepresentations in grant applications, contract fraud and kickback schemes, falsified time records, and pandemic funding frauds. The plea agreements and sentencings reached in these cases also demonstrate our office's commitment to pursuing serious frauds against AmeriCorps to the extent necessary to protect taxpayer funds and taxpayer-funded programs. The cases identified in this report also culminated in administrative actions, including the recovery of funds, enhanced training for Federal or grantee staff, and updated monitoring practices.

Highlights of Investigative Work Completed During This Reporting Period

Criminal Investigations



[Former Non-Profit Executive Director Pled Guilty to Defrauding the AmeriCorps VISTA Program](#)

Barbara Harris, former Executive Director of the Center for Community Academic Success Partnerships (CCASP), former Co-Executive Director of South Suburban Community Services (SSCS), and Volunteers in Service to America (VISTA) Project Director, pled guilty to two counts of wire fraud. Harris admitted submitting grant applications to AmeriCorps that falsely represented that VISTA members would work for SSCS developing programs intended to bring economic opportunities to Chicago, when she knew the members would actually be used to support unrelated, already-funded programs. Harris also admitted to the submission of grant applications through CCASP that inflated projected annual expenses and falsely claimed CCASP would receive services from subcontractors, some of which were run by Harris and provided no actual services to CCASP.



Multi-Agency Investigation Results in Conspiracy Pleas from Two Subjects

A multi-agency investigation identified multiple government and non-government individuals engaged in a conspiracy to illegally award or obtain government contracts. AmeriCorps OIG identified two subjects as part of the investigation: Government Printing Office (GPO) Senior Contracting Specialist Kyana Washington and Raymond Parks. In August 2021, Parks introduced Washington to a third-party, and Washington entered into an agreement with the third-party to assist in obtaining GPO contracts in exchange for 20% of the contracts' value. The third party also agreed to provide Parks with a kickback in return for introducing him to Washington.

Both subjects pled guilty to one count of conspiracy to commit bribery and honest services wire fraud. Washington was sentenced to two years of probation and restitution of \$7,098.37, and Parks was sentenced to two years of probation and restitution of \$23,363.



Subject of a Wire Fraud Conspiracy Pled Guilty to Two Counts

We previously reported the indictment of three individuals in the Northern District of Illinois for a scheme involving false invoices and kickbacks. During this period, Brian Metcalf, a former employee of a Chicago-area AmeriCorps grantee, pled guilty to two counts of conspiracy to commit wire fraud for his role in defrauding an AmeriCorps program and an Indiana school system. Metcalf acknowledged losses of over \$1 million to the organizations involved. A sentencing date has not been scheduled.

Criminal Updates for Cases Previously Reported



Criminal Cases Involving Two Defendants in Mississippi Results in Pretrial Diversion, Home Confinement

We previously reported that the U.S. Attorney's Office for the Southern District of Mississippi indicted Operation Upward President and CEO Robrelle Murray for allegedly filing false time and attendance reports at Operation Upward while employed full-time elsewhere and falsely representing the number of employees at the organization to receive a Paycheck Protection Program loan. During this period, Murray entered into a Pretrial Diversion Program that will resolve the case if she successfully completes it. She agreed to pay \$54,700 in restitution.

Wesley Murray, Robrelle's ex-husband, previously pled guilty to wire fraud in relation to a fraudulent application for and receipt of Economic Injury Disaster Loan funds using a business previously owned and operated by his ex-wife. During this period, he was sentenced to 12 months of home confinement, followed by 36 months of supervised release, and restitution of \$77,084.17.

Administrative Investigations



AmeriCorps Issued Debt to Recover Costs Associated with Volunteer Stipends and Non-compliant National Service Criminal History Checks

AmeriCorps OIG substantiated allegations that the City of Oakland, Office on Aging (City of Oakland) paid Senior Companion Program (SCP) and Foster Grandparent Program (FGP) volunteers full stipends when volunteers either did not serve or document the hours claimed. This period occurred following the end of AmeriCorps' authorization for grantees to pay volunteers a temporary allowance due to the COVID-19 pandemic. The City of Oakland continued paying its volunteers full stipends for about 15 months after the temporary allowance ended but was unable to provide documentation supporting \$136,776 worth of

hours served. Further investigation found that the City of Oakland was unable to provide documentation supporting volunteer stipends for the periods of May 2019 to December 2019 and February 2020 to December 2021. Evidence collected also supported a finding that the City of Oakland maintained insufficient National Service Criminal History Checks for 38 SCP and FGP volunteers, a violation of Federal regulations and a significant safety issue.

At AmeriCorps OIG's recommendation, AmeriCorps initiated recoupment actions to recover \$596,535 in grant funds. AmeriCorps also required that City of Oakland take additional actions including certifying the completion of required trainings and developing a policy that outlines the roles and responsibilities for the completion of required grant reports.

Recommended Recovery: \$596,535.00

Amount Recovered: \$596,535.00



[*AmeriCorps Declined to Recoup \\$181,000 Awarded to Subgrantee Due to Misrepresentations in its Grant Application and Progress Reports*](#)



AmeriCorps OIG conducted an investigation that found evidence that the Axiom Education and Training Center (AETC) included false information in its AmeriCorps grant application to Volunteer Maine, the state service commission, and that AETC mismanaged its AmeriCorps Digital Inclusion Initiative program.

AmeriCorps OIG found evidence that AETC misrepresented the status of a grant application AETC had submitted to the United States Economic Development Administration (EDA). AETC's AmeriCorps grant application

indicated that the EDA grant was pending, but AETC did not submit its EDA grant application until almost a year after AETC received its AmeriCorps funding. Since AETC did not have the EDA funding in place, it was unable to perform some necessary functions of its AmeriCorps program, including hiring staff to supervise members and purchasing laptops for members to perform their service. AETC later reported in three of its five quarterly progress reports to Volunteer Maine that its EDA grant was delayed even though it had not yet submitted its grant application to the EDA. AmeriCorps OIG also found that two specific AETC employees were budgeted to spend 100% of their time on the AmeriCorps project as grantee match, but time records showed they spent significant time on other duties. AETC also claimed more than \$80,000 as match for uncompensated overtime hours staff worked on the AmeriCorps program.

AmeriCorps OIG recommended that AmeriCorps disallow the entire award (\$181,008.19) since the organization made significant misrepresentations in its proposal and reports. In response, AmeriCorps acknowledged AETC's application was not accurate but did not disallow funds because the costs incurred were for allowable member costs. AmeriCorps disallowed \$82,188 in unallowable match claimed by AETC

for personnel overtime, as well as \$4,494.09 in living allowance payments for a member who did not record service hours.

Recommended Recovery \$181,008.19

Amount Recovered: \$4,494.09



[AmeriCorps Disallows Improperly Charged Salary Costs from a VISTA Program But Declines to Disallow \\$67,000 in Living Allowances](#)

An AmeriCorps OIG investigation determined that Hawaii Community Assets (HCA) used a Volunteers in Service to America (VISTA) member to serve as its Information Technology (IT) Coordinator for three years and allowed the VISTA member to take multiple college classes during normal business hours. Additionally, the investigation found that a VISTA Program Supervisor at Aloha United Way (AUW) covertly obtained a second full-time job as Operations Manager at HCA and submitted timesheets to both organizations claiming full-time work at each for about five months. Leadership at AUW and HCA were unaware of that employee's dual employment, and HCA stopped charging her salary to its VISTA grant after learning of it. Finally, the investigation found that AUW improperly drew down \$19,800 in salary costs for its two VISTA Program Supervisors that should have been charged to non-VISTA programs. The two supervisors spent 17% and 71%, respectively, on non-VISTA programs when they should have worked 100% of the time on the VISTA program.

AmeriCorps OIG made eight recommendations, including that AmeriCorps disallow \$65,987.74 in living allowance and \$10,735.05 in an education award for the member performing IT Coordinator duties. AmeriCorps concurred with two of the eight recommendations. It disallowed the \$19,800 in staff salaries improperly charged to AUW's VISTA program. The AmeriCorps Office of Monitoring said they will plan to work with program staff regarding members enrolled in classes to track what they consider reasonable to ensure compliance.

AmeriCorps did not disallow \$65,987.74 paid to the member performing IT Coordinator duties since, while the member's IT duties did not align with his VISTA Assignment Description, HCA did not have a previously existing IT Coordinator that the member displaced. AmeriCorps declined to define full-time service as it allows VISTA sponsors to define what constitutes full-time. AmeriCorps believed its existing guidance provided sufficient parameters for sponsors and members regarding the number of educational classes members can take, did not see evidence that the classes the member serving as IT Coordinator took interfered with his ability to serve, and left the decision-making authority to the VISTA sponsor as to the appropriate amount of coursework a member may take. Finally, AmeriCorps believed that AUW provided sufficient training to address how grantees manage the financial aspects of their grants.

We disagreed with AmeriCorps' decision to reject our disallowance recommendation for the funds paid to the member acting as IT Coordinator since the [regulations](#) governing AmeriCorps state that members may not perform any services or duties, or engage in activities, that will supplant the hiring of employed workers. The member's IT duties did not align with his VISTA Assignment Description and allowed HCA to obtain IT services it needed without hiring an employee.

Recommended Recovery \$96,522.79

Amount Recovered: \$19,800.00



[*AmeriCorps Disallows Subgrantee Costs Associated with Living Allowances, Education Awards, and Non-compliant National Service Criminal History Checks*](#)

An AmeriCorps OIG audit referred concerns to the Office of Investigations regarding the submittal of false documents and unallowable living allowances to non-AmeriCorps members by Kuumba Academy. The evidence collected through the investigation supported findings that Kuumba received reimbursement for living allowances for non-members, had members displace at least three substitute teachers and one paraprofessional, and had four members exited with compelling personal circumstances (CPCs) who lacked supporting documentation. The investigation further found Kuumba had timesheets indicating time and attendance fraud, maintained insufficient and/or inaccurate National Service Criminal History Checks (NSCHCs) and failed to properly exit members at the conclusion of its grant term.

In response to AmeriCorps OIG recommendations, AmeriCorps disallowed \$78,326.25 of costs associated with improper living allowance payments and non-compliant NSCHCs. Further, AmeriCorps coordinated with Volunteer Delaware, the state service commission, to ensure that Kuumba's remaining members were successfully exited. In response to a recommendation to review Volunteer Delaware's subgrantee monitoring process and provide training regarding subgrantee monitoring, AmeriCorps' Office of Monitoring provided Volunteer Delaware with its Uniform Monitoring Package and guidance as to which sections would be applicable and prudent for Volunteer Delaware to apply in its subgrantee monitoring practices.

Recommended Recovery \$78,326.25

Amount Recovered: \$78,326.25



[*AmeriCorps Disallows Living Allowances Paid to Members Before They Were Enrolled in the My AmeriCorps Portal*](#)

An AmeriCorps OIG investigation determined that Movement of Youth improperly paid lump sum living allowances to members for service performed before they were properly enrolled in AmeriCorps systems, improperly paid members different living allowance rates, and paid living allowances to members who performed little or no service, among other findings. In response to AmeriCorps OIG's findings, AmeriCorps disallowed \$21,142.88 improperly paid to members, and the North Carolina Commission on Volunteerism and Community Service updated its training materials and program monitoring.



Recommended Recovery \$25,857.20

Amount Recovered: \$21,142.88

Strong Partnerships with the Department of Justice and Other Law Enforcement Colleagues

AmeriCorps OIG partners with various USAOs throughout the country as part of its criminal and civil enforcement efforts. These partnerships help us further our anti-fraud mission and have yielded positive results during this reporting period. AmeriCorps OIG continues its outreach efforts with various Federal prosecutors to pursue civil and criminal resolutions, where appropriate, and to ensure we are using every tool in our toolbox, including parallel criminal and civil remedies. Our collaboration with USAOs has helped AmeriCorps OIG deter criminal and civil fraudulent activity and ensured that communities get the most out of AmeriCorps programs.

During the reporting period, we partnered with USAOs in the following districts:

Middle District of Alabama
District of Columbia
District of Connecticut
Northern District of Illinois
Northern District of Georgia
Eastern District of Virginia
District of Massachusetts

Northern District of Mississippi
Southern District of Mississippi
Eastern District of Pennsylvania
Western District of Kentucky
District of Maryland
Eastern District of Wisconsin

We also worked closely with other OIGs and law enforcement agencies as we conducted investigations during the reporting period.

Investigations Statistical Summary Tables

Figure 9: Investigative Cases Statistics

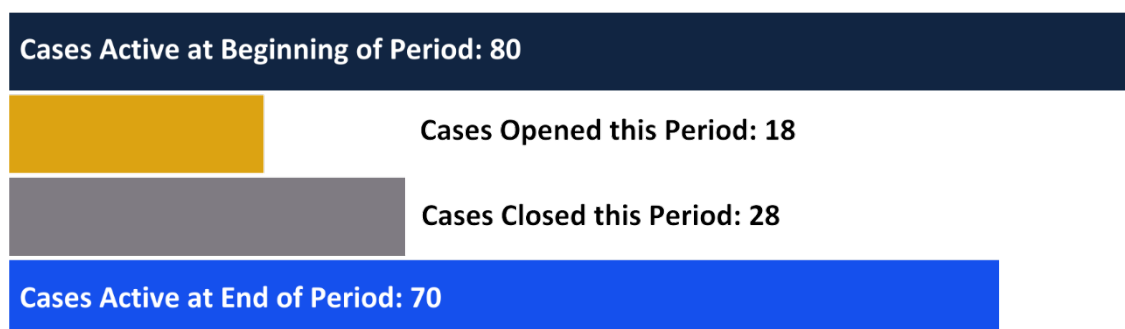


Figure 10: Investigative Case Activities

Individuals and Entities Referred for Federal Criminal Prosecution	1
Referrals to State/Local Criminal Authorities	0
Indictments/Criminal Information	1
Arrests	0
Criminal Convictions/Pleas	4
Referrals to Federal Civil Prosecutors	0
Referrals to State/Local Civil Authorities	0
Civil Settlements/Judgments	0
OIG Reports of Investigation Issued to AmeriCorps	6
Administrative Actions taken by AmeriCorps as a Result of OIG Reports of Investigation (includes agency suspension/termination of awards, employee misconduct remedies, other actions taken in response to OIG investigations)	9
Reports of Investigation Pending AmeriCorps Response Next Semiannual Period	2
Suspension and Debarment Recommendations	8
Total Investigative Recoveries (includes funds returned/recovered, funds put to better use, restitution, fees, and civil settlements)	\$1,069,348.76

SUSPENSION AND DEBARMENT

Suspension and debarment are administrative tools that protect the Federal government from doing business with individuals and organizations that cannot be trusted to comply with laws, rules, and regulations or to be good stewards of Federal funds. Suspension temporarily excludes a person or entity from receiving government awards, generally for up to 12 months. Debarment excludes a person or entity from receiving government awards for a set period, generally up to three years. During this reporting period, AmeriCorps OIG recommended eight individuals and entities for debarment, primarily due to convictions related to theft of government funds.

In the past, AmeriCorps OIG has also recommended suspension or debarment action for cases involving embezzlement, false certifications of reporting requirements, time and attendance fraud, pandemic –aid-related fraud, and sexual assault or harassment committed by AmeriCorps members and AmeriCorps Seniors volunteers against minors.¹² AmeriCorps' Suspension and Debarment Official (SDO) decides whether to issue a suspension or propose debarment, notifies the affected individual or organization, and considers any information that they may submit in opposition before deciding whether to suspend or debar.



Recommendations
to AmeriCorps

8

The active coordination between AmeriCorps and AmeriCorps OIG strengthens the protection of Federal funds. Timely action on suspension and debarment recommendations is important to protect public funds. While AmeriCorps continues to face challenges in promptly acting upon OIG recommendations, AmeriCorps made significant strides this reporting period in pushing forward debarment actions based on OIG recommendations. We continue to work with AmeriCorps to minimize delays, act upon OIG recommendations, and strengthen its suspension and debarment program.



Debarment Proposals
Issued by AmeriCorps

5

During the semiannual period, AmeriCorps OIG recommended the government-wide debarment of five individuals and three entities. The eight debarment recommendations stemmed from convictions related to theft of government funds or fraud.



Individuals/ Entities
Suspended or Debarred

5

One of the instances for which AmeriCorps OIG recommended government-wide debarment involved Barbara Harris-Woodard, former Executive Director of the Center for Community Academic Success Partnerships (CCASP) and former Co-Executive Director of South Suburban Community Services (SSCS), who pled guilty to two counts of wire fraud. Harris-Woodard admitted to submitting grant applications to AmeriCorps that falsely represented that VISTA members would work for SSCS developing programs intended to bring economic opportunities to

¹² Generally, misconduct warranting exclusion must demonstrate a lack of business integrity. 48 C.F.R. § 9.406; 2 C.F.R. § 180.800.

Chicago, when she knew the members would actually be used to support unrelated, already-funded programs.

The five debarment proposals and subsequent five debarments were from OIG recommendations made in a prior semiannual period.

OUTREACH ACTIVITIES

Outreach with internal and external stakeholders is key to achieving the goals of our strategic plan. Our work is more effective when we have open communication and engagement with agency leadership and staff as well as grantee and subgrantee staff. This semiannual period, we continued our emphasis on educating all stakeholders about the work that we do and the role that they play in preventing and detecting fraud, waste, and abuse within AmeriCorps programs and operations, including:

- In person and virtual stakeholder meetings,
- Anti-fraud trainings,
- Council of the Inspectors General on Integrity and Efficiency (CIGIE) Committee board and working group participation, including leadership and instructor roles,
- Audience-focused fraud advisory publications, and
- Social media outreach.

Outreach During Semiannual Period



Meetings and Anti-Fraud Training

13



Committees and Working Groups

12



Advisory Publications

1



Social Media Campaigns

2

Immediate Office Outreach Activities

The Acting Inspector General (IG) and Acting Deputy IG are active participants in an array of committees, boards, and working groups within the IG community. For example, our Acting IG is the Vice Chair of the CIGIE Professional Development Committee.

In addition to participation in varied affinity groups, the Immediate Office recognizes the importance of in-person engagement with AmeriCorps grantees as a mechanism for opening lines of communication and reducing fraud, waste, and abuse. We accomplished this primarily by attending and presenting at AmeriCorps State Commission convenings in seven states during this period. The majority of attendees at these events are AmeriCorps State and National grantees and subgrantees, participants in AmeriCorps' largest grant program, and range in size from 20 to over 100 participants. We also continued to conduct meaningful and ongoing outreach with agency stakeholders, including a series of meetings with various AmeriCorps offices.

We also continued to publish our Anti-Fraud Advisory series designed to raise awareness of common types of fraud, waste, and abuse within AmeriCorps programming. We published the fifth volume of the Advisory during this period which focused on prohibited and unallowable activities within AmeriCorps grantee projects.

Office of Audits and Office of Investigations Outreach Activities

AmeriCorps OIG auditors are active participants in cross-agency initiatives sponsored by CIGIE. Our participation enhances our awareness and provides an avenue to share our expertise with other Offices of Inspector General.

In addition to participation in IG community working groups, our office partners with the Pandemic Response Accountability Committee to identify pandemic-related fraud trends as we oversee American Rescue Plan Act funding.

Audit staff, along with representatives from other AmeriCorps OIG offices, brief AmeriCorps departments on prior audit and investigative findings and fraud risks. Additionally, audit staff spoke to AmeriCorps and AmeriCorps Seniors grantees and State Commissions on topics including the OIG audit and investigation processes, internal controls, common audit and investigation findings, and how compliant financial and grant administration can avoid these pitfalls.

Our investigators educate grantees and subgrantees, State Commission personnel, and AmeriCorps staff regarding the prevention and detection of fraud, waste, and abuse; developing strong internal controls and fraud indicators; and the reporting requirements of suspected fraud. The Office of Investigations regularly revises its fraud training to focus on emerging issues and new strategies.

The Office of Investigations supports the CIGIE Inspector General Criminal Investigator Academy by providing adjunct instructors. The Office of Investigations led several substantive sections of training for the Academy on topics ranging from whistleblower investigations to contracting and grant fraud. In this capacity, AmeriCorps OIG contributes to the continuing education of the Inspector General community on matters relating to grant fraud.

Selected Meetings and Anti-Fraud Events

- Seven State Commission staff and grantee convenings: Maine, Michigan, Vermont, Oklahoma, South Carolina, Rhode Island, and Ohio
- October 2024: Participated in the Fall CIGIE Career Fair to encourage rising professionals to join the fight against waste, fraud, and abuse in Federal programs
- November 2024: Presented at the Association of Inspectors General Annual Training Conference covering subrecipient risks, challenges, and approaches for better subrecipient oversight
- December 2024: Acting Inspector General testified before the House Higher Education and Workforce Development Subcommittee on *“Examining the Policies and Priorities of AmeriCorps and Its FY 2024 Audit Failure”*
- February 2025: Led a training event at the Inspector General Criminal Investigator Academy titled *“Shifting from A Criminal to Administrative Mindset”*
- February 2025: Participated in an expert panel at the Inspector General Criminal Investigator Academy focused on the pitfalls and best practices relating to whistleblower retaliation investigations
- February 2025: Led the contracting and grant fraud components of the Inspector General Criminal Investigator Academy’s Transitional Training Program

Committee, Board, and Working Group Participation

- CIGIE Audit Committee
- CIGIE Data Analytics Working Group
- CIGIE Inspections and Evaluations Committee
- CIGIE Legislation Committee
- CIGIE Professional Development Committee (Acting Inspector General serves as Vice Chair)
- CIGIE Financial Statement Subcommittee
- CIGIE Quality Assurance Working Group
- Federal Audit Executive Council
- Inspectors General Firearms Working Group
- Interagency Grant Fraud Working Group and its Subrecipient Challenges Subgroup
- Pandemic Response Accountability Committee
- GAO State and Local Subcommittee

Advisory Publications

- Anti-Fraud Advisory, Vol. 5: [“What are Prohibited or Unallowable Activities?”](#)

Social Media Campaigns

- [International Fraud Awareness Week](#)
- Promotion of AmeriCorps OIG work products

PEER REVIEW

Offices of Inspectors General undergo periodic peer reviews to ensure their operations meet the professional standards of the IG community. The results of a peer review must be included in the Semiannual Report of the reviewed office, which must also identify any recommendations that have not been fully implemented. The OIG conducting the peer review must likewise identify the outstanding and unimplemented recommendations pertaining to the office that it reviewed. The specific statutory requirements for this reporting are contained in Section 989C of Public Law 111-203, which amended Section 5 of the Inspector General Act of 1978.

AmeriCorps OIG's Most Recent Peer Reviews

The positive peer reviews of AmeriCorps OIG's audit, inspection and evaluation, and investigations operations confirm the rigor of AmeriCorps OIG's oversight, which ensures that AmeriCorps is accountable to the public.

Investigation Peer Reviews

In September 2024, the National Archives and Records Administration (NARA) OIG completed its review of AmeriCorps OIG's Office of Investigations. NARA OIG found the office compliant with the CIGIE's Quality Standards for Investigations and the Attorney General Guidelines for Offices of Inspectors General with Statutory Law Enforcement Authority. NARA OIG's review identified several best practices at AmeriCorps OIG, including well organized policies and training documents, and an excellent culture with a supportive and helpful work environment.

Inspection and Evaluation Operations Peer Review

In March 2023, the Special Inspector General for the Troubled Asset Relief Program (SIGTARP OIG) completed its peer review of AmeriCorps OIG's inspections and evaluations operations. The review concluded that the evaluation policies and procedures and selected inspection and evaluation reports issued between October 1, 2019, and September 30, 2022, complied with CIGIE's Quality Standards for Inspection and Evaluation (Blue Book) standards and AmeriCorps OIG's internal policies and procedures. AmeriCorps OIG's next inspections and evaluations peer review will be conducted by the Government Publishing Office OIG in FY 2026.

Audit Operations Peer Review

In June 2022, AmeriCorps OIG issued the report of its most recent audit operations peer review by the Library of Congress OIG. The review concluded that the system of quality control for audit operations from October 1, 2018, through September 30, 2021, met GAO's Generally Accepted Government Auditing Standards (April 2021 revision). AmeriCorps OIG's audit operations received a rating of pass, the highest rating available. Architect of the Capitol OIG is currently conducting a peer review of AmeriCorps OIG's audit operations for the period October 1, 2021, to September 30, 2024.

Peer Reviews Conducted by AmeriCorps OIG

In March 2025, AmeriCorps OIG's Office of Investigations completed its peer review of the Library of Congress OIG's Investigations Division. The review found that Library of Congress OIG's system of internal safeguards and management procedures for investigative operations complied with the quality standards established by CIGIE and other applicable guidelines and statutes.

In May 2024, AmeriCorps OIG's Office of Audits conducted a modified peer review of inspections and evaluations at the Commodity Futures Trading Commission Office of Inspector General (CFTC OIG). This modified peer review required us to review only CFTC OIG's policies and procedures to determine compliance with the applicable Blue Book standards. The Office of Audits found CFTC OIG's policies and procedures were not consistent with the December 2020 Blue Book standards. CFTC OIG acknowledged its gaps and is now revising its policies and incorporating new procedures.

In FY 2025, the Office of Audits will conduct an audit peer review of the National Endowment for the Arts Office of Inspector General.

OTHER REPORTABLE MATTERS

Investigations Substantiating Misconduct by a Senior Government Employee

None.

Whistleblower Retaliation

During this reporting period, AmeriCorps OIG investigated two complaints of whistleblower retaliation made pursuant to 41 U.S.C. § 4712. In each, AmeriCorps OIG summarized its findings in reports of investigation to AmeriCorps, recommending that the agency find the allegations of retaliation unsubstantiated.

Residential Youth Care

In the first complaint of whistleblower retaliation, AmeriCorps OIG investigated that the Chief Executive Officer (CEO) of Residential Youth Care (RYC) in Ketchikan, AK, retaliated against the former RYC Director for protected whistleblowing. The allegations stemmed from Complainant's concerns that RYC failed to notify AmeriCorps members who were exited from the program for cause, which he believed was required by AmeriCorps regulations. The investigation found that while Complainant made a protected disclosure regarding the notification of exited members, there was insufficient evidence to prove that this disclosure was a contributing factor in his termination. The evidence demonstrated a legitimate business justification for the CEO's termination of the Complainant.

The evidence showed that Complainant's repeated disregard of leadership's instructions on multiple occasions constituted insubordination and was unrelated to his whistleblowing activities, such as when the Complainant was order not to contact the members directly and to let the state service commission handle the matter of their separation.. In response, AmeriCorps issued a Memorandum Decision and Order in which it found that the former Program Director failed to show by a preponderance of evidence that he was a protected whistleblower and that he failed to state a claim of unlawful retaliation because RYC demonstrated that it would have terminated him absent his protected disclosure.

Nevada Volunteers

In the second complaint, OIG investigated whistleblower allegations that the Director of Nevada Volunteers in Reno, NV, terminated the employment of a former Deputy Director in retaliation for protected disclosures related to the Director's financial management and stewardship. The OIG determined the Complainant did not prove whistleblower retaliation, as the financial mismanagement concerns were either not reported to the Director or were raised after the termination decision. The OIG also determined that the performance issues preceding any disclosures justified the termination. In response, AmeriCorps issued a Memorandum Decision and Order in which it found the Complainant showed by a preponderance of the evidence that he was a protected whistleblower but failed to state a claim of unlawful retaliation because the grantee demonstrated by clear and convincing evidence that it would have terminated the Complainant absent any of his protected disclosures.

Undisclosed Audits, Investigations, Evaluations, or Inspections

None.

APPENDIX A: OPEN RECOMMENDATIONS



Recommendations not
fully implemented as of
March 31, 2025

174

Open recommendations are divided into those that are *Overdue* (open more than a year), *Unresolved* (open recommendations with which AmeriCorps disagrees), *Not Yet Due* (open between six months to less than a year), and *New* (issued within the reporting period).

Figure 11: Breakdown of Open Recommendations



Overdue Recommendations

Figure 12: Potential Cost Savings of Overdue Recommendations

Questioned Costs: \$3,126,473

Better Use: \$0

This list is a summary of the reports with recommendations that were Overdue (open more than a year) as of March 31, 2025.

Reports with Overdue Unimplemented Recommendations 133 Recommendations			
Report Number	Report Title	Number of Overdue Open Recs	Dollar Value of Potential Cost Savings
OIG-18-12	VISTA Program Evaluation	1	\$0
OIG-19-08	Agreed-Upon Procedures for Corporation for National and Community Service Grants Awarded to the Serve Guam Commission	2	\$0
OIG-20-01	Audit of the Corporation for National and Community Service's Fiscal Year 2019 Consolidated Financial Statements	18	\$0

Reports with Overdue Unimplemented Recommendations 133 Recommendations			
<u>OIG-20-01</u> and <u>OIG-20-02</u>	Audit of the Corporation for National and Community Service's Fiscal Year 2019 Consolidated Financial Statements and National Service Trust Fund Financial Statements	7	\$0
<u>OIG-20-03</u>	Fiscal Year 2019 Federal Information Security Modernization Act Evaluation of the Corporation for National and Community Service	5	\$0
<u>OIG-20-05</u>	Performance Audit of the Corporation for National and Community Service's Compliance under the Digital Accountability and Transparency Act of 2014 for FY 2019	1	\$0
<u>OIG-AR-21-02</u>	Performance Audit Report of AmeriCorps' Internal Control Program and National Service Trust Liability Model for Fiscal Year 2020	1	\$0
<u>OIG-AR-21-05</u>	Performance Audit of AmeriCorps' Compliance under the Digital Accountability and Transparency (DATA) Act of 2014 for Fiscal Year 2021	8	\$0
<u>OIG-AR-22-01</u>	Audit of AmeriCorps' Fiscal Year 2021 Consolidated Financial Statements and National Trust Fund Financial Statements	2	\$0
<u>OIG-AR-22-01</u> and <u>OIG-AR-22-02</u>	Audit of AmeriCorps' Fiscal Year 2021 Consolidated Financial Statements and National Trust Fund Financial Statements	3	\$0
<u>OIG-AR-22-04</u>	Performance Audit of AmeriCorps' Compliance with the Payment Integrity Information Act of 2019 for Fiscal Year 2021	2	\$0
<u>OIG-AR-23-01</u>	Audit of AmeriCorps' Fiscal Year 2022 Consolidated Financial Statements	9	\$0
<u>OIG-AR-23-01</u> and <u>OIG-AR-23-02</u>	Audit of AmeriCorps' Fiscal Year 2022 Consolidated Financial Statements and National Trust Fund Financial Statements	8	\$0
<u>OIG-AR-23-04</u>	Performance Audit of AmeriCorps' Charge Card Program for Fiscal Year 2021	6	\$0
<u>OIG-AR-23-06</u>	Performance Audit of AmeriCorps Seniors Grantees' Financial Management Systems	7	\$42,945
<u>OIG-AR-23-07</u>	Audit of AmeriCorps Grants Awarded to Puerto Rico Commission for Volunteerism and Community Service	7	\$0

Reports with Overdue Unimplemented Recommendations 133 Recommendations			
<u>OIG-AR-24-01</u>	Audit of AmeriCorps' Fiscal Year 2023 Consolidated Financial Statements	14	\$0
<u>OIG-AR-24-01</u> and <u>OIG-AR-24-02</u>	Audit of AmeriCorps' Fiscal Year 2023 Consolidated Financial Statements and National Trust Fund Financial Statements	5	\$0
<u>OIG-AR-24-05</u>	Performance Audit of AmeriCorps Grants Awarded to YouthBuild USA	13	\$3,083,528
<u>OIG-AR-24-06</u>	Performance Audit of AmeriCorps Grants Awarded to Serve DC	3	\$0
<u>OIG-EV-21-01</u>	Evaluation of AmeriCorps Grants Awarded to the Maine Commission for Community Service	5	\$0
<u>OIG-EV-22-06</u>	AmeriCorps Penetration Testing and Phishing Campaign Evaluation	3	\$0
<u>OIG-EV-23-08</u>	Fiscal Year 2023 Federal Information Security Modernization Act Evaluation of AmeriCorps	3	\$0
Total		133	\$3,126,473

Unresolved Recommendations



Unresolved
Recommendations
included in Open
Recommendations

22

We classify a recommendation as unresolved and include it in our count of open recommendations when:

1. AmeriCorps disagrees with fully implementing the recommendation,
2. The OIG disagrees with an AmeriCorps' plan of action for a recommendation, or
3. AmeriCorps does not successfully implement our recommendation.

Figure 13: Potential Cost Savings of Unresolved Recommendations



This list is a summary of the reports with Unresolved recommendations as of March 31, 2025.

Report Number and Title	Reports with Unresolved Recommendations	Dollar Value of Potential Cost Savings
	22 Recommendations	
	Recommendation and Reason AmeriCorps Disagreed 22 Total	
OIG-12-04 Audit of Earned Education Awards Resulting from Compelling Personal Circumstances	<p>Rec. No. 3(b): Implement the text description functionality in the MyAmeriCorps Portal to allow grantee personnel –to document the Compelling Personal Circumstances justifications.</p> <p><i>AmeriCorps stated that regulations require programs to maintain documentation and limited text descriptions would not provide adequate documentation. Full documentation is best kept at the program level in members' files.</i></p>	\$0
OIG-12-04 Audit of Earned Education Awards Resulting from Compelling Personal Circumstances	<p>Rec. No. 3(c): Implement monitoring controls requiring a secondary level of review of each approved partial education award.</p> <p><i>AmeriCorps stated that prorated awards are relatively rare and have a very limited financial impact on the National Service Trust. AmeriCorps considers the operational and organizational cost of having AmeriCorps programs submit those cases for a second level of review burdensome and not cost effective, given the low risk involved.</i></p>	\$0

Report Number and Title	Reports with Unresolved Recommendations 22 Recommendations Recommendation and Reason AmeriCorps Disagreed 22 Total	Dollar Value of Potential Cost Savings
OIG-14-09 Audit of Blanket Purchase Agreements for Professional Consulting Services	<p>Rec. No. 2: A central review committee (including a representative of the Office of Procurement Services) approve any consulting projects that exceed pre-established cost thresholds.</p> <p><i>AmeriCorps stated that an enhanced senior level review was established after issuance of the audit report. In FY16 a Risk Management Committee reviewed a consolidated list of FY16 service contracts with value over \$150,000. In FY17 department heads with service contracts with total value over \$500,000 will review and approve the acquisition needs statement.</i></p>	\$0
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 2: Identify all grantees and subgrantees whose service activities involve providing healthcare to women and girls of childbearing age, as well as those with service activities directed at education or mentoring of girls and young women middle school-aged and above and determine whether they have engaged in abortion-related prohibited activities within a pre-determined period.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 3: Conduct similar risk assessments, identification of at-risk grantees, communications and targeted monitoring for other prohibited activities.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 4: Identify any other factors that may increase the risk of individual prohibited activities and use that information for targeted education, training and monitoring as appropriate.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance.</i></p>	\$0

Report Number and Title	Reports with Unresolved Recommendations 22 Recommendations Recommendation and Reason AmeriCorps Disagreed 22 Total	Dollar Value of Potential Cost Savings
	<i>AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i>	
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 6: Enhance the capacity of eGrants to store and search critical emails; institutionalize policies and procedures to allow POs and GOs to capture key emails in eGrants; and develop criteria for identifying emails to be captured.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 7: CNCS's to-be-developed Enterprise Risk Management strategy and planning include a component for specific prohibited activities, commensurate with magnitude of the risk, including the reputational and political risk to CNCS.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 8: Accelerate the development of a more focused, targeted and risk-based model and approach to all grant monitoring including continuous assessment of the effectiveness of CNCS's grant risk assessments and monitoring.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0

Report Number and Title	Reports with Unresolved Recommendations 22 Recommendations Recommendation and Reason AmeriCorps Disagreed 22 Total	Dollar Value of Potential Cost Savings
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 9: Without waiting for the development of a comprehensive risk-based monitoring strategy, develop and implement monitoring strategies for specific prohibited activities that can be conducted frequently, do not depend on site visits and provide a meaningful opportunity for prompt detection of violations or red flags, including searches of social media sites and surveys of members in accessible language, using the MyAmeriCorps Portal.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0
OIG-MA-16-03 OIG Management Alert Prohibited Activities: Missed Opportunities	<p>Rec. No. 10: Assess during the grant application process whether an applicant is at particular risk for one or more specific prohibited activities. If so, CNCS should require that the grantee develop customized ways to address compliance with that prohibition, including detection controls. The Corporation should incorporate the resulting information into the monitoring plan and target CNCS monitoring activities accordingly and assess the effectiveness of the measures taken by the grantee.</p> <p><i>AmeriCorps stated that the grantee confirmed it would not comply with special conditions resulting from noncompliance. AmeriCorps informed the grantee that its grant would expire on August 31, 2016, and that the grantee should commence orderly close-out of their award. Accordingly, AmeriCorps considered action complete on all recommendations in this report.</i></p>	\$0
OIG-18-07 Audit of Corporation for National and Community Service Grants Awarded to Mayor's Fund to Advance New York City	<p>Rec. No 2(a): Disallow and recover \$1,663,952 in Federal costs awarded to Madison Strategies Group (MSG).</p> <p><i>AmeriCorps agreed that MSG's contract for services with Grant Associates, a related for-profit entity, was not awarded in conformance with OMB Circular A-110 and MSG's own Conflict of Interest policy. AmeriCorps disallowed \$106,214 in Federal costs. However, AmeriCorps did not agree to disallow the entire subaward amount because at the time MSG received the SIF subgrant from the Mayor's Fund, MSG was eligible to be a SIF subrecipient.</i></p>	\$1,663,952

Report Number and Title	Reports with Unresolved Recommendations 22 Recommendations Recommendation and Reason AmeriCorps Disagreed 22 Total	Dollar Value of Potential Cost Savings
<u>OIG-18-12</u> VISTA Program Evaluation	<p>Rec No. 5: VISTA should specifically measure the effectiveness of the policy allowing VISTA members to take classes while serving in the VISTA program. CNCS VISTA should build performance measures into all policy/procedure changes as a means to evaluate overall effectiveness of the change and allow for continuous process improvement.</p> <p><i>AmeriCorps stated that it does implement performance measures to evaluate the overall effectiveness of changes that allow continuous programmatic improvement, it will not go back to measure the effectiveness of the policy that allows VISTA members to take classes in their spare time that was implemented more than six years before the issuance of this report.</i></p>	\$0
<u>OIG-18-13</u> Agreed-Upon Procedures for Corporation Grants Awarded SerVermont	<p>Rec No. 2(d): Disallow and, if already used, recover education awards made to members who did not serve the minimum required service hours.</p> <p><i>AmeriCorps stated it reviewed the member position description and materials for the program and determined that the service in question did not represent a direct benefit to the for-profit entity. The direct beneficiaries of tours were potential homeowners within the community, and homes in question were owned by a non-profit entity.</i></p>	\$11,570
<u>OIG-19-06</u> Agreed-Upon Procedures (AUP) review of AmeriCorps grant funds to Serve Indiana	<p>Rec. No. 11: Recover the \$43,626 in questioned Federal costs and \$19,390 in education awards and address any impact to Federal costs of the \$33,720 in questioned match costs for American Red Cross of Indiana for grant No. 15ACHIN001.</p> <p><i>AmeriCorps stated it does not disallow match costs related to criminal history checks. Costs related to noncompliance with NSCHC requirements are disallowed based on the level of noncompliance and corrective action taken by the grantee. AmeriCorps disallowed a total of \$7,500 in federal funds related to this NSCHC noncompliance.</i></p>	\$96,736
<u>OIG-19-08</u> Agreed-Upon Procedures for Corporation for National and Community Service Grants Awarded to the Serve Guam Commission	<p>Rec. No. 11: Require Serve Guam Commission to submit an updated Financial Federal Report for the 14AH award that removes the \$18,761 of questioned match costs.</p> <p><i>AmeriCorps reviewed the staff NSCHC files and agreed with the auditors' findings. AmeriCorps applied the NSCHC enforcement action to determine the appropriate disallowance and calculated a total disallowance of \$4,893 in match costs and requested the Commission to revise its FFR.</i></p>	\$18,761

Report Number and Title	Reports with Unresolved Recommendations 22 Recommendations Recommendation and Reason AmeriCorps Disagreed 22 Total	Dollar Value of Potential Cost Savings
<u>OIG-20-06</u> Audit of Corporation for National and Community Service AmeriCorps Grant Awarded to St. Bernard Project	<p>Rec. No. 1: Calculate and recover the questioned Federal costs, match costs, and related administrative costs. Also, determine the impact on Federal costs due to questioned match costs.</p> <p><i>AmeriCorps allowed \$11,230 in questioned Federal costs because although SBP failed to fully implement good internal controls, AmeriCorps found no evidence to demonstrate that reasonable work was not performed on the award and the matter can be addressed through corrective actions. AmeriCorps did disallow \$14,411 in Federal costs for instances where timesheets did not reconcile to accounting records.</i></p>	\$25,641
<u>OIG-EV-21-01</u> Evaluation of AmeriCorps Grants Awarded to the Maine Commission for Community Service	<p>Rec. No.1: Disallow the \$592,737 in questioned match costs and recover the \$254,014 in Federal costs from LearningWorks for the program years 2017 and 2018 due to inadequate documentation to support its in-kind match contributions: donated classroom and office space, and teaching and administrative staff hours.</p> <p><i>AmeriCorps stated that LearningWorks subsequently provided significant documentation supporting its claimed match costs.</i></p>	\$846,751
<u>OIG-EV-21-01</u> Evaluation of AmeriCorps Grants Awarded to the Maine Commission for Community Service	<p>Rec. No.2: Conduct an assessment of LearningWorks' match contribution for its third-year funding to determine whether it met its match requirement, disallow any unsupported match contributions and recover any Federal funds that were overpaid as a result of LearningWorks' failure to meet its match requirements.</p> <p><i>AmeriCorps stated that it performed this assessment and found that LearningWorks was able to support its claimed match costs and no match or Federal funds will be disallowed.</i></p>	\$0
<u>OIG-AR-24-05</u> Performance Audit of AmeriCorps Grants Awarded to YouthBuild USA	<p>Rec No.4: Recover from YouthBuild \$520,827 of education awards that were paid to members for subgrantees within the audit scope.</p> <p><i>AmeriCorps agreed to recover the amount related to SJCC's unallowable program. AmeriCorps declined to take corrective actions on this recommendation. AmeriCorps stated that YouthBuild's timekeeping policy aligned with its intended Terms and Conditions.</i></p>	\$168,686

Report Number and Title	Reports with Unresolved Recommendations 22 Recommendations Recommendation and Reason AmeriCorps Disagreed 22 Total	Dollar Value of Potential Cost Savings
OIG-AR-24-05 Performance Audit of AmeriCorps Grants Awarded to YouthBuild USA	Rec No.5: Require that YouthBuild pay the \$3,087,791 outstanding AmeriCorps Education awards yet to be distributed to the members of subgrantees within the audit. <i>AmeriCorps agreed to recover the amount related to SJCC’s unallowable program. AmeriCorps declined to take corrective actions on this recommendation. AmeriCorps stated that YouthBuild’s timekeeping policy aligned with its intended Terms and Conditions.</i>	\$1,723,124
OIG-AR-24-05 Performance Audit of AmeriCorps Grants Awarded to YouthBuild USA	Rec No. 6: Assess the remaining \$9,042,686 of at-risk funds to determine if sufficient supporting documentation for the hours claimed exists. If sufficient documentation does not exist, recover from YouthBuild the \$1,349,717 already paid by the Trust and require that YouthBuild pay the \$7,692,969 outstanding AmeriCorps Education awards yet to be distributed to members. <i>AmeriCorps declined to take corrective actions on this recommendation. AmeriCorps stated that YouthBuild’s timekeeping policy aligned with its intended Terms and Conditions.</i>	\$9,042,686
Total		\$13,597,907

Recommendations Not Yet Due

This list is a summary of the reports with recommendations that are Not Yet Due (open between six months and to less than one year) as of March 31, 2025.

Reports with Recommendations Not Yet Due			
3 Recommendations			
Report Number	Report Title	Number of Open Recommendations	Dollar Value of Potential Cost Savings
OIG-AR-24-04	AmeriCorps' Compliance with the Payment Integrity Information Act of 2019 for Fiscal Year 2023	3	\$0
Total		3	\$0

New Recommendations Issued this Period

This list is a summary of the reports with New Recommendations issued during this period (open less than six months) as of March 31, 2025. Some of these recommendations are modified repeat recommendations that supersede recommendations previously listed as overdue.

Reports with New Recommendations 16 Recommendations			
Report Number	Report Title	Open Recommendations	Dollar Value of Potential Cost Savings
<u>OIG-AR-24-03</u>	FY 2024 Federal Information Security Modernization Act Audit	5	\$0
<u>OIG-AR-25-01</u>	Audit of AmeriCorps' Fiscal Year 2024 Consolidated Financial Statements	2	\$0
<u>OIG-AR-25-01</u> and <u>OIG-AR-25-02</u>	Audit of AmeriCorps' Fiscal Year 2024 Consolidated Financial Statements and National Trust Fund Financial Statements	9	\$0
Total		16	\$0

AMERICORPS' RESPONSE



AmeriCorps' Response to the OIG Semiannual Report 25-01

AmeriCorps

May 27, 2025



MESSAGE FROM THE INTERIM AGENCY HEAD

AmeriCorps appreciates the opportunity to respond to the Office of Inspector General's (OIG) Semiannual Report (25-01), which covers the first half of fiscal year 2025. As the federal agency dedicated to strengthening communities, fostering civic engagement, and improving lives through service, we value our shared commitment to accountability and oversight. We welcome the OIG's insights and remain committed to our responsibility to safeguard federal funds, ensuring its effective use while preventing waste, fraud, and abuse.

In service,

A handwritten signature in black ink, appearing to read 'Jennifer Bastress Tahmasebi'.

Jennifer Bastress Tahmasebi
Interim Agency
Head AmeriCorps