

## **AmeriCorps Required a Grantee to Issue Guidance Regarding Appropriate Member Activities and Updated Its Requirements for the Use of Official Email Accounts by Contractors Following an AmeriCorps OIG Investigation**

Closed 09/15/22

The AmeriCorps Office of Inspector General (AmeriCorps OIG) investigated allegations that a former Volunteers in Service to America member (VISTA) at Campus Compact for New Hampshire (CCNH), Concord, NH, was asked to perform duties and responsibilities outside of the complainant's VISTA Assignment Description (VAD) and that Equal Employment Opportunity (EEO) investigators used personal email addresses for official investigative correspondence.

AmeriCorps OIG's investigation found that the VISTA taught two courses during the fall semester of 2020 at the VISTA's service site, University of Maine at Presque Isle (UMPI), despite UMPI's awareness that engaging the VISTA in an instructor role was prohibited. The VISTA also participated in direct-service activities, which included COVID testing and assisting quarantined students by delivering meals or mail. Additionally, AmeriCorps OIG substantiated allegations that on three occasions, two individuals employed or contracted by the AmeriCorps Equal Employment Opportunity (EEO) Office used personal email addresses for correspondence in an EEO investigation. The use of personal email accounts to conduct AmeriCorps business raised concerns related to the security of the information exchanged, records retention and Freedom of Information Act requirements, and the ability of AmeriCorps and AmeriCorps OIG to appropriately oversee employees and contractors.

AmeriCorps OIG referred this matter to AmeriCorps and recommended that AmeriCorps (1) Establish a debt against UMPI for the portion of the VISTA living allowance received during the time the VISTA engaged in displacement activities, (2) provide training to UMPI on the rules and regulations governing VISTA service, and (3) require AmeriCorps guest email accounts for EEO contractors and ensure that staff and contractors use official government email addresses when conducting official government business.

### **Agency/Administrative Actions**

AmeriCorps' response stated that while UMPI failed to follow guidance from CCNH that the VISTA was not permitted to teach courses, the VISTA was not prohibited from volunteering at UMPI in addition to the VISTA's service role. AmeriCorps also found there was not enough information to ascertain whether the COVID-19 related activities conducted by the VISTA were in violation of program rules.

With respect to OIG's recommendation to provide training to UMPI on the rules and regulations governing VISTA service, AmeriCorps explained that, since UMPI is no longer a site, providing training to UMPI on rules and regulations governing VISTA service was not necessary and would not result in better support for members. Instead, AmeriCorps asked CCNH to issue reminders to

their current sites regarding appropriate member activities and the prohibition on displacement of employed staff.

Regarding the use of personal email accounts by EEO contractors, AmeriCorps agreed that this raised professional and security concerns and noted that it is in the process of ensuring all email use by EEO contractors and staff is conducted in a single business email system that is professional, secure, and Federal Information Security Modernization Act compliant. New EEO contracts will contain terms requiring the contractor to ensure that no personal email addresses are used to conduct agency business.

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