AmeriCorps Members Displace Staff and Perform Service Outside the Scope of the Grant, Unauthorized Use of Match Funds, and AmeriCorps Members Submitted Fraudulent Timesheets.

Closed 10-18-2017

CNCS-OIG investigated an allegation that Center for Family Services (CFS), Camden, NJ, directed AmeriCorps members (member) to displace paid staff and members were submitting fraudulent timesheets.

The investigation found that CFS violated the CFS AmeriCorps grant when they assigned members to perform service outside the scope of the grant, (2) 45 CFR § 2540.100 (e) when they required members as part of their service to perform activities substantially similar to those already performed by an employee (teacher/assistant teacher), and (3) 45 CFR § 2521.45 when they failed to comply with match requirements. In addition, two former members knowingly submitted fraudulent timesheets.

Interviews of members and staff revealed that CFS violated 45 CFR § 2540.100 and their AmeriCorps grant terms and conditions when they (1) routinely assigned members duties duplicated the role of a paid staff in the classroom and (2) performed service outside the scope of the grant. Based on the grant terms, members were to provide academic and social support to individual or small groups of children and thereby foster early literacy and social skills. However, the investigation found there was no clear distinction between staff or the members. CFS management and the site supervisors confirmed there was little to no difference between the assistant teacher duties and member's service. In fact, the roles were so similar, members were frequently assigned to cover as the assistant teacher when staff were late or absent.

To meet the match requirements of the AmeriCorps grant, CFS used Head Start Program grant funds as the source of match for grant years 2013 through 2016. However, coordination with Health and Human Services personnel revealed this was an unallowable use of Head Start grant funds. The Head Start Program match funds for grant year 2016, was approximately \$137,000.

Two members admitted to CNSC-OIG investigators of inflating their services hours on their timesheets. The members claimed to have performed their service, but overstated on their timesheets the number of hours they actually served.

Agency/Administrative Actions:

CNCS management concurred with CNCS-OIG recommendation and took the following actions: (1) disallowed \$140,885 in match funds, (2) directed the New Jersey Commission to take appropriate corrective actions to prevent members from performing activities inconsistent with and outside the scope of the grant agreement, and (3) both members that inflated their timesheets were exited from the program without an Education Award. In addition, the CFS' 2017 grant was placed on hold until CFS presented evidence of adequate match funding.

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