



Short-Term and Long-Term Recommendations to Make National Service More Equitable and Accessible

This document is intended to provide an overview of ways in which the federal AmeriCorps agency (Corporation for National and Community Service) can take meaningful action to make national service more equitable and accessible. To do this, the agency must center its mission on AmeriCorps members, volunteers, the communities they serve, and the field representing them (state service commissions and programs). These recommendations are divided into short-term actions the agency currently has the ability to control and longer-term actions that may require rulemaking and/or legislative action. This is not an exhaustive list and highlights some of the more pressing and ongoing challenges facing state service commissions and the larger AmeriCorps State and National field.

Equity should be a priority for the AmeriCorps agency. In a recent executive order “[On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#)”, President Biden calls on federal agencies to **conduct an equity assessment to look at potential barriers that underserved communities and individuals face to participate and whether policies, regulations or guidance documents may need to be changed**. Even if equity was not a priority for the administration, the agency should focus its efforts in this area because failure to do so will limit the agency in meeting its mission and potentially limit growth of the agency and its programs.

At the forefront of assessing potential barriers, it is important to acknowledge the inherent tension between making national service resources more accessible and the agency’s current everyday practices, which are often overly compliance-oriented, frequently punish people/programs for administrative mistakes, and fail to provide adequate training/support necessary to attract diverse organizations and members to this work. Having a punitive approach has created less trust, does not lead to more compliance, and directly keeps diverse-led and less resourced organizations from participating in national service. The agency should remove barriers to applying and managing its grants and ensure that applicants and members serving are not harmed by the agency’s own guidance and policies.

A key part in advancing equity should be developing a culture of trust, mutual respect, continuous improvement, transparency, and communication with the national service and volunteer engagement field. We are grateful to our colleagues at the federal agency for their dedicated public service and we are ready to work collaboratively to ensure all communities have the opportunity to access national service resources and individuals have the opportunity to serve. We hope we can build on our existing partnership to continue to improve national service to expand on its legacy of success.

We are all learning, and we hope the federal agency will make it a priority to model this learning – recognize where mistakes have been made or guidance is simply outdated and adjust policies and practices moving forward. By implementing the recommended solutions to barriers outlined in this document, the federal agency will make strides in making its grantmaking more equitable and improving the recruitment and retention of a diverse cadre of AmeriCorps members that are reflective of the communities in which they serve.

Engaging Stakeholders in Policy and Guidance Development



The AmeriCorps agency does not consistently follow statute and the federal system in implementing its own rules and guidance, which has resulted in its grant programs being more challenging to manage in the field. If the federal agency remedies this issue, we will see AmeriCorps program management and compliance improve significantly, which will in turn make national service more accessible for all types of organizations, communities, and Americans that want to serve. While we do not expect the agency and the field to always agree, we do expect the agency will genuinely engage stakeholders to understand concerns and opportunities prior to implementing changes.

As part of its annual appropriations process, Congress has directed the federal agency to not make changes without public notice and comment rulemaking stating: ***“CNCS shall make any significant changes to program requirements, service delivery or policy only through public notice and comment rulemaking.”*** Unfortunately, for the past several years, spanning the past two administrations, the federal agency has ignored this requirement in several instances and continues to make significant changes to program requirements without the opportunity for public comment, while at the same time using the public comment process for changes far less significant. Related to this, AmeriCorps often misconstrues policy (something that has gone through public comment and rulemaking) with [guidance](#), which is non-binding and does not have the force and effect of laws, even though the agency may treat it in such a way.

Of note, there have been several [improvements to reducing AmeriCorps State and National \(ASN\) program management barriers in the past three years](#), which we strongly recommend continuing. Most of these changes are examples of AmeriCorps State and National incorporating feedback from the field and working to eliminate unnecessary or duplicative bureaucratic “red tape” that did not add value to the management or oversight of programs.

While we are appreciative of these changes throughout the past few years, simultaneously there have been new and in some cases harmful changes we think should be immediately rectified in order to ensure AmeriCorps is successful. **We strongly recommend the agency follow statute and use public notice and comment rulemaking as appropriate moving forward and work closely with ASC and other groups representing the field’s stakeholders to inform guidance and policy changes through the development and implementation phase.**

The following are opportunities to improve equity, accessibility, and remove barriers to AmeriCorps and national service that the agency has the authority to enact immediately:

- 1) **Hold members harmless due to enrollment errors.** In July 2018, ASN instituted new enrollment guidance and related changes to eGrants (initially referred to as a policy change that should have gone through rulemaking per above due to the significance of the change). This guidance changed 25 years of precedent in providing programs up to **30 days to enroll a member in the member management portal**. This change essentially forced “enrollment” in the eGrants system to become an “eligibility” issue. According to regulations and statute, enrollment in the system is not an eligibility criterion, even though now it is being treated as such. In addition, ASN reversed course on its previous longstanding practice of “holding members harmless” by disallowing otherwise eligible service hours and/or preventing members from accessing their full education awards due to delays in enrollment. In addition, this change has resulted in unequal treatment



of some AmeriCorps applicants/members due to delays in the citizenship verification process since this change in guidance. **We urge the agency to change this guidance to at a minimum: 1) always hold eligible members harmless by avoiding disallowing hours and Education Awards; and 2) provide a process to allow commissions, whether directly or through their SPM, to correct start dates for eligible members in a swift and timely manner.** Read more on these requests in letters sent to the agency in [November 2019](#) and [June 2020](#) (to date the agency has not responded to either of these letters).

- a. In addition, AmeriCorps should **provide clear, plain language guidance and instructions on citizenship documentation and allow for reasonable exceptions/alternatives** to providing the documentation. It is not uncommon for prospective members that are older in age to decline to participate because of the documentation requirements.
- b. Allow new grants to be “open” prior to award for programs to begin the time-consuming processes of enrollment, citizenship verification, etc. sooner.

2) **Ensure commissions have maximum flexibility to expend their grant funds to support local communities.** The AmeriCorps agency has at times made it challenging for commissions to fully utilize their funds which is problematic for commissions and the federal agency. ASN and the Office of Grant Administrations (OGA) have made improvements related to this in the past year and it is important these improvements continue including, but not limited to, the **ability to use a placeholder and a planning grant prime for formula funds.** Areas of continued challenge and opportunity:

- a. Provide **instructions to commissions and AmeriCorps agency staff on using the placeholder and planning grant prime.**
- b. Provide instructions to commissions and agency staff **on requesting no-cost slots.**
- c. Provide **instructions to agency staff and commissions on starting a new project outside of the normal formula deadline** in eGrants and shorten the time to do this. Prior to the transition to regional offices, creating a new project in eGrants would typically take less than a week. Since the transition to regional offices, it can take 6-8 weeks for the agency to create a new project in eGrants for a commission. This has resulted in delays in granting formula funds and negatively impacts the ability to respond to emerging needs, like the COVID-19 pandemic.
- d. Provide commissions with the **ability to “carryover” funding within a three-year grant** by using a “block grant” approach to AmeriCorps formula grants. As part of the block grant process, allow commissions to return funds they will not use. By “block granting” for 3 years it could also reduce the redundancy of commissions having to apply for funds twice a year (six times for a three-year grant). With awarding a three-year grant the agency could adjust/add funds as they become available. Alternatively, the agency should maintain its current process but make a **commitment upfront to not capping unexpended funds carryover from year-to-year within a three-year grant.** As formula grants it is concerning the agency has at times limited the ability for commissions to carryover funds that Congress intended to be allocated to specific state and territories.
- e. **Remove the portfolio cost per MSY maximum average requirement** as this is not in statute or regulations and arbitrarily hinders commissions ability to provide flexibility to programs that may need higher cost per MSYs due to the geography or populations served. The low cost per MSY and the portfolio average were created during a different time when some members of Congress questioned



the ROI of AmeriCorps. The program now enjoys robust bipartisan support, and we have ample research supporting the efficiency of AmeriCorps State and National programs.

- f. **Reinstate the ability for commissions to participate in “buyback” or an alternative to expend funds** for those that want to use formula funds to purchase Education Awards to support members and a program in the next grant year **or** allow for an extension of a prime into a fourth year if funds are available to support a programming **without the limitation of the 12-month enrollment limit applying from the previous grant year.**
 - g. Allow for **formula funds to be used for formula evaluations or data analysis** either through award to subgrantees or contractors by the commission without counting towards the cost/MSY requirement. Also allow program evaluation costs to not be considered in the program cost/MSY.
- 3) **Provide a waiver on the four-term limit for AmeriCorps** participants ([see letter from January 2020 requesting this](#)). Authorize state service commissions to provide a waiver on the rule that limits AmeriCorps service to four terms based on compelling and/or reasonable circumstances. This is an ongoing issue that is exacerbated by the COVID-19 pandemic, with an increased desire for people to serve, but they are limited due to term limits. The four-term limit does not distinguish between the types of terms so a member serving short 100 hour or 300 hour terms will face the same ban as someone who serves four full-time terms creating an inequity and punishing those that serve in shorter term limits without knowing the long-term consequences.
- 4) **Increase the cost per MSY per statute.** The single most common issue we hear related to advancing equity and diversity in AmeriCorps relates to the low living allowance. While ASN sets a minimum and maximum living allowance, most programs do not have the financial cash match resources to provide a living allowance that is significantly higher than the cost per MSY. Per statute, the federal agency should be raising the cost per MSY to align with annual cost of living adjustments and allow the cost per MSY to be set as high as allowed in statute. While we understand how this may impact the quantity of AmeriCorps members available due to funding limitations, we urge the agency to prioritize equity and quality so we can then prioritize quantity, as new federal resources are secured. [See statutory language here](#). This is an issue of dignity and equity. For members living without family to provide financial assistance, many AmeriCorps members have quit the program because they are unable to meet their and their family's basic needs on the poverty-wage stipend. Increasing the maximum cost per MSY restores dignity and levels the playing field for thousands of Americans that want to serve.
- a. In addition, ASN should clarify and/or change past guidance to allow additional benefits, such as housing benefits, to NOT count towards the total for the maximum living allowance. This will enable programs that are able to provide additional benefits the ability to do so while also increasing the living allowance. The past guidance was in rescinded FAQs, but there has been no clarity on this since rescinded.
 - b. Make sure that cost per MSY increases are funded for continuation programs (both competitive and formula funded), and that the allowable increases take into account other increased costs beyond just required living allowance increases (NSCHC, health insurance, etc.).



- 5) **Engage the field in reshaping and improving NSCHC requirements and compliance.** In addition to reviewing [ASC's public comment](#), we invite review of our [feedback on the NSCHC Enforcement Guide](#), a guidance document that has significant financial and time burden on the field.

NSCHC disallowances and related fines have had a significant negative impact on the national service field, driving out several programs due to the financial impact and keeping others from joining due to fear of a human error resulting in significant cost disallowances. We know NSCHC requirements have discouraged and driven highly capable organizations away from AmeriCorps, because they do not want to deal with the heavy administrative burden and often cite how much more challenging AmeriCorps is to manage compared to the amount of funding received and compared to other federal grants they administer. We believe safety should be a priority for AmeriCorps, but financially penalizing organizations for making mistakes (not fraud, waste or abuse), when they complied with statutory requirements, is not how to ensure the safety of both the populations served and AmeriCorps members. **Instead of safety, the federal agency has prioritized compliance to the detriment of everyone.**

The federal agency should take the following steps/changes:

- a. Immediately clarify that fixed amount grants with NSCHC non-compliance will not have disallowances (unless members are found to be ineligible). *The agency has failed to respond to questions related to this for more than a year.*
 - b. Replace disallowances for minor/limited noncompliance for cost-reimbursement grants with corrective action. For example, if NSCHC is late by 2 days and for those 2 days the member was in training with no unaccompanied contact with vulnerable populations, disallowances should not occur. Disallowances should be reserved for significant and ongoing compliance failures and/or when ineligible members are found to have served. If this does not change at the federal level, the agency should clarify that commissions are not required to follow the agency provided Enforcement Guide guidance when addressing NSCHC non-compliance.
 - c. Noncompliant NSCHCs should not result in disallowances for PIIA/IPERIA (improper payment) findings unless members are found to have been ineligible to serve.
 - d. The federal agency should re-focus its time on reducing risk by providing adequate training and support to the field on applicant screening, policy/procedure development, and training on issues such as sexual harassment, how to protect vulnerable populations, etc. to help prevent safety issues.
- 6) **Provide clarity on roles and responsibilities at the agency.** At times, it appears that internal agency staff are uncertain about whose role and responsibility it is to complete various tasks resulting in significantly delayed responses which negatively impact members and grantees. There must be clear responsibilities outlined for the various roles in the regional offices and those at headquarters. Based on commission interactions with regional offices, additional training on basic functions in eGrants, various program regulations, and understanding when to contact the Trust, National Service Hotline, or the program office would be valuable for regional office staff. We understand these challenges are not unique to commissions,



but also extend to national directs, Tribal grantees, and AmeriCorps Seniors programs as well. It is not uncommon for a commission or program to call the Helpdesk, be referred to their SPM who tells them to call the Helpdesk. We understand change is hard and takes time, but some regional offices have been in place for more than one year and these challenges continue. **Further, we hope the federal agency will consider extending the field the same grace they expect from us when mistakes or delays take place.**

- 7) Make necessary changes to standardized forms to be more inclusive, as detailed in a [letter sent to the federal agency](#) regarding ongoing **problematic language with the AmeriCorps enrollment and exit forms**. This directly impacts the ability of programs to recruit from diverse populations. The agency should have a process to allow members to be recognized by their name (not their dead name) in the myAmeriCorps portal.
- 8) **Re-invest in disability inclusion**. In the past, the federal agency made disability inclusion a priority and that has not been the case for many years. As of now, there is no **guidance on how the field can access existing reasonable accommodations funding**. In the short-term, we ask the agency to release updated guidance on the current process. In the long term, we encourage the agency to identify resources (Congress has provided the authority to use up to 2% of program funding, with a maximum of \$20 million for disability outreach and placement; the agency can also utilize unexpended funds) for programs to support inclusion efforts, such as helping to offset the costs of reasonable accommodations, to ensure national service is able to provide the appropriate service experience for all that want to participate.
- 9) **Broaden the criteria for demonstrating evidence of program effectiveness**. The current evaluation and evidence definitions and related requirements limit how smaller programs can advance through the evidence tiers (e.g., you cannot be at the “Strong” evidence tier unless you have a multi-site RCT, so a state-based program without multiple sites could never reach “Strong” unless they found a program elsewhere who wanted to replicate their unique program design and then do an RCT of the two sites). The agency’s current evaluation and evidence requirements do not align with the available federal funds for AmeriCorps and is a prime example of a significant unfunded mandate by the federal agency to support such requirements (as other federal agencies do).
 - a. Adjust the definition of an independent evaluation to be more inclusive of other rigorous evaluation methods that are meaningful and more appropriate for AmeriCorps and national service. The federal agency can amend its evaluation FAQs guidance now to more appropriately define independent evaluation per regulations. [Read more on this here](#).
- 10) **Improve clarity throughout the AmeriCorps website on AmeriCorps benefits**. The webpage detailing the living allowance and value of the education award is confusing and amounts to sharing incorrect information to the field because few people understand the distinction between timing of fiscal year appropriations and timing of award of the prime grants.
- 11) **Add a match waiver option back into the AmeriCorps NOFO** (post-COVID recovery) and ensure readability and [plain language guidelines](#) are met. Per statute, there should be a transparent process for programs to



request a match waiver or reduced match; such a waiver is allowed for in regulations but has not been included in the AmeriCorps State NOFO for the last 10 years. This could increase accessibility to organizations from under-resourced areas.

12) Improve the childcare assistance for AmeriCorps:

- a. Make it easier for childcare providers to become certified to be an eligible AmeriCorps childcare provider so more providers are available to members that serve.
- b. In some states, a family member who lives with a member cannot be reimbursed as the childcare provider (while a non-household family member can). This practice favors Western culture and disadvantages other families such as those from immigrant and refugee communities whose households are more likely to include extended family members. Other benefit programs such as Medicaid allow household members to be paid as caregivers.

13) Work with other federal agencies and commissions to ensure adequate guidance is provided on AmeriCorps grantmaking and member benefits to state agencies:

- a. Ensure SNAP benefits are not impacted by an AmeriCorps member's living allowance.
- b. Ensure disregarding VISTA stipends as income when considering eligibility in other federal programs (i.e., Medicaid, disability, etc.).
- c. Work to secure updated federal match waiver letters from federal agencies to reinforce to state agencies receiving federal funds that such funds can be used as match for AmeriCorps.

14) Become a federal government leader in addressing justice, equity, diversity and inclusion by 1) providing relevant training; 2) committing to increasing diversity in AmeriCorps; 3) conducting research on the impact of service on racial bias, equity, etc.; and 4) utilizing data and feedback to make improvements to programs, service activities, and member experiences.

15) Improve training and guidance to the field by providing timely and regular training on topics related to managing an AmeriCorps grant with a focus on the basics for new program grantees.

- a. Work with **Tribal AmeriCorps** grantees to identify and support their unique and specific needs related to AmeriCorps program management.

16) Remove grant manual holds that have lasted more than 90 days (*statute only allows for suspension of payments for no more than 90 days*) and eliminate the practice of arbitrarily placing commissions on manual hold for corrective action. This practice does nothing to improve compliance nor does it provide the necessary training and support the commission may require. This practice actively harms and hinders the commission in its ability to make necessary improvements. Currently, manual holds on at least three commissions are inappropriate and unlawful. If the agency chooses to continue a practice of using the manual hold process, offer transparency to situations which may warrant a manual hold and follow uniform guidance when placing and removing the holds.



- 17) **Continue to expand access to fixed amount grants.** Less resourced and smaller organizations would benefit from the reduced burden provided by fixed amount grants. We recommend allowing all applicants, including first-time competitive grants to be able to apply for a fixed amount grant. We appreciate the agency has made important steps to open up fixed grants in recent years by increasing the cost per MSY and providing additional flexibilities to commissions. USAID uses fixed grants with its grantees overseas because they recognize it reduces risk for the agency and organizations – AmeriCorps should emulate this approach.
- 18) As formula grants, **the agency should reduce or eliminate the application for Commission Support Grant and Commission Investment Fund applications** and move to a block grant process per above. In addition, revise related reporting to prevent duplicative reporting. For example, CSG has a report question on program member retention – *why did programs not retain all of their members?* which is the same answer for most programs every year in their separate program GPR reporting.
 - a. The agency should work with ASC to ensure **equitable increases to CSG and CIF allocations to state service commissions** if/when additional resources for these grants are available. ASC recently made a recommendation on increasing the small state minimum to \$280,000 and remove the cap on large states to allow them up to the statutory amount of \$1 million. Current funding would allow for this and result in increases for all commissions versus just a handful of mid-size commissions if the allocation/formula is kept the same.

Additional Longer-Term Changes

- 1) **Engage the field in revisiting AmeriCorps branding.** The commission network [expressed significant concerns](#) with the brand, logo, and messaging launch in September 2020. There are concerns about the logo itself, especially from alumni, that the new logo looks outdated, corporate, and does not reflect the legacy or values of national service. In addition, some of the messaging has been viewed as elitist and nationalistic – leading to several commissions and programs saying they will not use it for fear that it will alienate certain people, making recruitment even more challenging. Finally, the transition of the AmeriCorps agency from CNCS is confusing, bulky and should be reevaluated as well. While this will take time, the agency has the opportunity to pause the branding implementation which is not yet fully complete and work with the field to **create a more inclusive and welcoming brand** for all.
- 2) **Remove the 20% aggregate training cap set in regulations** (§ 2520.50). There are existing safeguards through the application process to ensure member activities are appropriate and would not include excessive training hours. Every program and member have different training needs and the 20% aggregate cap does not accommodate for these nuances.
- 3) **Change the threshold for an independent evaluation in regulations to at least \$2,500,000 from \$500,000 to better align resources available for quasi-experimental design evaluations within AmeriCorps**



budgets. This would require a rulemaking change to regulations. Adjust the regulations on program evaluation to broaden the criteria for demonstrating impact of program effectiveness and re-prioritize member development as a program impact.

- 4) **Advocate to allow DACA recipients and other non-citizens with legal status (i.e., Marshallese) to serve as AmeriCorps members.** Just as dropouts are encouraged to earn their high school diploma or GED during service, DACA recipients could be supported in preparing for citizenship by the end of the term of service. This would require legislative action. Currently DACA recipients are able to serve as AmeriCorps VISTA members, because VISTA offers an end of service cash stipend alternative to the education award. As an interim step prior to legislation allowing this, the agency could allow programs to provide AmeriCorps State and National members with a cash stipend alternative to the education award to allow them to serve.
- 5) **Advocate to allow education awards to be transferred to anyone designated** and do not count the gift of an education award count towards the individual's limit on earning two full awards. This discourages a service legacy in a family if a child who receives two full education awards cannot then go on to earn their own awards. Currently AmeriCorps alumni that are 55 and older [can transfer their education award](#) to a child or grandchild. We believe this should be expanded to allow alums of any age to transfer their education award to anyone they designate. This would require legislative action.
- 6) **Advocate for removal of the federal tax on the living allowance and Segal AmeriCorps education award** to remove the significant tax burden placed on national service participants during and after AmeriCorps service.
- 7) In lieu of an education award, **provide members with the option for an end of service cash stipend.** This is an existing option for AmeriCorps VISTA and provides an incentive to serve for those that may not need the education award.
- 8) **Create a data sharing agreement with ASC and/or individual state service commissions for AmeriCorps alumni data and education award usage by state/programs.** This would improve state level engagement of alumni and related talent pipeline initiatives. In the short-term, commissions should not have to fill out the same data request form as external researchers do just to request data on their own alumni.
- 9) **Support passage of the CORPS Act or similar legislation that would expand resources for the cost per MSY, living allowance, and education award benefits for members.** In addition, support the ability to provide commissions with Program Authority/Single Site Placement to improve access to smaller and under-resourced organizations.
- 10) **Support commissions in serving as VISTA Intermediaries and as a [National Service Hub](#), along with appropriate resources.** Currently, at least seven commissions are serving as successful VISTA intermediaries, with more commissions starting VISTA projects in 2021. Commissions with an intermediary VISTA project



improve access to VISTA for smaller organizations that do not have the need for their own project. The National Service Hub model is win-win for the agency, focusing the role of the federal agency on customer service, grantmaking, monitoring, and compliance for VISTA and Senior Corps while empowering commissions to support VISTA program development and training, activities that will complement their existing program development and training for AmeriCorps State programs.

11) Re-invest in traditional volunteerism and meet the agency’s mission of community service to complement national service including but not limited to:

- a. Follow statute by appropriately investing in the Volunteering and Civic Life in America survey and related analysis per our [public comment](#) and [letter to OMB](#).
- b. Update agency branding and messaging to be more inclusive of traditional volunteering, service-learning, days of service, and the Volunteer Generation Fund (VGF). Communicate the role and value of all forms of service and use inclusive language.
- c. Work with VGF grantees to improve VGF grant administration including reducing performance measure burden. For example, the VGF NOFA requires use of agency National Performance Measures and includes this as part of the point scoring criteria, even though this is not the case for AmeriCorps or other agency grant applicants. The national performance measures do not reflect the scope of impact of VGF, which is to build volunteer infrastructure. VGF applicants should be able to create applicant determined measures and performance measures should not be included in the scoring of the application.
- d. Allow VGF grantees to conduct pre/post retrospective surveys, as opposed to requiring pre-test be done pre-activity. The current requirement on pre/post assessment is unrealistic and retrospective pre/post assessments are considered credible and valid by performance measure and evaluation standards.
- e. Clarify in guidance that VGF funds can be used in partnership with other agency grant resources, such as VISTA or AmeriCorps Seniors, to maximize community impact and support the development of innovative strategies (there has been inconsistent guidance depending on the program officer or SPM).

12) Update the AmeriCorps Grant Terms and Conditions to ensure they are in alignment with Uniform Grant Guidance and the federal grant system including [plain language guidelines](#) and [readability](#).

- a. Update the language related to notifying the Office of Inspector General to align with other OIG federal agencies. The language on reporting to the OIG when a grantee “first suspects” fraud, waste, and abuse should be removed. It is vague and unreasonable. By simply removing “first suspects”, the grantee will be still required to report when/if they have “potential knowledge” of fraud, waste, and abuse. While we support a strong OIG, we believe it is important their work is focused on complaints and instances of fraud, waste, and abuse that are founded and not driven by a culture of fear among the field. Fear does not drive success. In order to build a culture of trust, we must move away from a culture of fear and punitive action for minor compliance issues. The OIG should be focusing its limited



resources on actual instances of fraud, waste, and abuse and work with the federal agency and field to address issues of non-compliance and solutions for prevention including risk assessment, monitoring, and training and technical assistance.

- 13) **Work with the field to develop a solution to eGrants while providing training and support on the current system.** Throughout the last two presidential administrations, the federal agency has spent tens of millions of dollars on attempts to replace the current eGrants system. These attempts have failed, in large part due to the agency not engaging the field and appropriate internal staff on understanding the needs of such technology. The agency must prioritize upgrading its member management and grant management technology. However, this prioritization must not diminish the need for ensuring the current system is operational and that agency staff and the field have proper training and technical support on its use until a new system is available. At the present moment, there are several outstanding issues with eGrants that are in some instances harming members by not allowing them to access their education award or delaying the start of programs that would be critical to the response to COVID-19 or other pressing community needs. We encourage the agency to empower its staff with the training and access necessary to provide support to the field. Not only will this benefit current grantees, but it would also help ensure technology is less of a barrier for new grant applicants and member/volunteer applicants.