

MEMORANDUM

To: State Commissions, AmeriCorps National Grantees and Tribal Grantees
From: Stephanie Enyart, Disability & Inclusion Advisor
Date: October 31, 2016
Regarding: FY 2017 Reasonable Accommodation Reimbursement Grants for AmeriCorps
State and National Service Members with Disabilities

This memorandum provides information for the new 2017 fiscal year beginning October 1, 2016 for ASN Programs who want to receive reimbursement for funds spent accommodating members with disabilities. Please find complete information on how to apply for a disability accommodation grant below. Also, please note the Resources for Finding Reasonable Accommodations at the end of this memo.

This fiscal year will be the first in which grantees can use a form specifically developed for reasonable accommodation reimbursement grants called the CNCS Disability Accommodations Reimbursement Request form. The form is attached and details all the necessary information to process a request. We hope that this form will simplify the process, saving time and effort for our partners in national service.

Process for submitting applications:

It is important to understand that by applying for a reimbursement grant, you are requesting to be reimbursed for expenses incurred. CNCS will not be making advance payments to cover reasonable accommodation expenses. **Reimbursements are made to prime grantees only.** It is requested that State Commissions and National Directs pass on to their sub-grantees that they are to apply through the Commission/National Direct grantee.

Reasonable accommodation grant funds are available on a noncompetitive basis and requests are processed in the order in which they are received. Funding is limited and will be awarded on a first-come, first-served basis.

CNCS encourages you to determine what each of your service member's accommodation needs are for the FY 2017 service term so that you can submit requests for reimbursement. Requests for reimbursement of a single expense can be submitted at any time. If you intend to request reimbursement for multiple expenses throughout the year, your initial request must estimate what your total reimbursable expenses may be.

Grantees must retain (and provide upon request) documentation for each member for whom reasonable accommodation grant funds are requested. The documentation must show that:

- The goods or services needed to provide the reasonable accommodation were procured in conformance with the procurement standard specified in 2 C.F.R. 200.317 – 200.326 (see end of this memorandum for more detail); and
- Verification by the member that the accommodation was provided.

Instructions:

Please send an email to accommodations@cns.gov with the attached form filled out completely. **Please do not convert it to PDF; Word documents are an already 508-compliant format.** Please include all the requested information to ensure timely processing. Incomplete applications cannot be processed.

You must also attach to the email your documentation of actual costs incurred for the claimed reimbursement, such as copies of a contract, receipt and/or invoice and evidence of payment of the expense. This documentation does not need to be in a section 508 compliant format. You will receive a response to your request for disability accommodation grant funds shortly after submitting it to accommodations@cns.gov.

NOTE:

- Do not include Personally Identifying Information (PII) in your request.
- Reimbursements are made *only* to the Prime Grantee.
- Accommodation reimbursements are only for current AmeriCorps members.
- Submission of this application for reasonable accommodation grant funds serves as a certification by the Grantee that the AmeriCorps member for whom the accommodation funds are sought has a disability as defined in the Americans with Disabilities Act (ADA). (“A person has a disability if they have a mental or physical impairment that substantially limits one or more major life activities.”)

You are not required to obtain documentation that the service member has a disability if the disability is apparent. You should obtain documentation from a medical or rehabilitation expert to better understand the need for the reasonable accommodation for service member requests where a disability is non-apparent or the accommodation request is not straightforward. These professionals can also verify that someone meets disability status. **Please note, there is much broader coverage under the ADA after the Amendments in 2008.**

Resources for Finding Reasonable Accommodations

The process of selecting the accommodation should be an interactive collaboration between the AmeriCorps member, his or her supervisor, and program managers. Free technical assistance regarding disability accommodation is available through the Job Accommodation Network: www.askjan.org.

Many individuals with disabilities may be clients of the Department of Vocational Rehabilitation (a.k.a. “RSA”), an agency that exists in each state, dedicated to training and supporting people with disabilities in search of gainful employment. It is worth exploring whether the member you are arranging accommodations for has a rehabilitation plan or whether they have access to equipment and services through Vocational Rehabilitation because of their affiliation with the agency. Here’s a directory of state-based Vocational Rehabilitation agencies: <https://rsa.ed.gov/>.

Each state also has an Assistive Technology program which can assist with information and referral, loan, and technical assistance questions. Here is a directory organized by state: <http://www.resnaprojects.org/allcontacts/statewidecontacts.html>.

2 C.F.R. 200.317 – 200.326 Requirements:

§200.316 Property trust relationship.

Real property, equipment, and intangible property, that are acquired or improved with a Federal award must be held in trust by the non-Federal entity as trustee for the beneficiaries of the project or program under which the property was acquired or improved. The Federal awarding agency may require the non-Federal entity to record liens or other appropriate notices of record to indicate that personal or real property has been acquired or improved with a Federal award and that use and disposition conditions apply to the property.