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**Question #1** Are there specific requirements or restrictions related to program-generated income? In particular, I am wondering how this would apply if trainees were to contribute to clinical billing as part of their training experience.

**Answer** Program income, including fees for service earned as a direct result of the award-funded program activities during the award period, must be retained by the recipient and used to finance the award's non-CNCS share. Common examples of program income include site fees, fees charges for a workshop or conference, or the sale of services or items produced by the program. Program income does not include: \* Revenue your program receives from sources to support the program that does not directly result from grant activities. \* Revenue the organization receives in the form of donations and contributions into its general fund, without any requirement that they be spent on a specific grant project. In most cases, programs use program income earned under AmeriCorps grants to meet the grant's non- Federal share requirements until the income is exhausted and then other non-Federal resources and/or ASN funds are used to meet any remaining cost share requirements. This means program income must be spent first, before requesting additional federal funds and must be used for allowable costs.

[eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

**Question #2** Do you have any additional guidance regarding the language on page 9 related to permissible trainee activities, specifically the provision stating that “a participant in a program receiving AmeriCorps assistance may not perform any services or duties or engage in activities that would otherwise be performed by an employee as part of the assigned duties of such employee”? Any clarification on how this distinction is typically interpreted or operationalized would be very helpful.

**Answer** An AmeriCorps member and staff member should not be working/serving side by side with the exact same duties, this would be duplication. And an organization shouldn't take what was being done by staff and turn it into AmeriCorps positions, this would be displacement. An applicant could take a program model that is being done by staff and replicate it elsewhere with members, a new service environment and the complexities that come with a new location would make it distinct and allowable.

An applicant could also take a program and expand the number of clients/students/etc. being served with the added force of members, if those member roles have something that sets them apart from the roles being filled by staff, that would also be acceptable.