



April 21, 2022

Dear AmeriCorps State and National Grantees,

**Re: Permissibility of using U.S. Department of Education funds as match**

AmeriCorps has determined that Section 121(e) of the National and Community Service Act of 1990, as amended (NCSA), Pub. L. 101-610, 104 Stat. 3127, codified at 42 U.S.C. §12571(e), authorizes state and national grantees to use funds from other federal sources to meet match requirements in specific budget categories. In short, if the other federal source of funds determines that use of their funds as match is permissible, or not prohibited by the statutes and regulations applicable to that Federal entity, then AmeriCorps grantees may use those funds as the NCSA's required match. Each federal agency/department has the authority to interpret its own governing statute and regs about whether their funding can be used as match.

As set forth in the attached letter from the Department of Education dated April 1, 2022, ED has concluded that use by ASN grantees of ED ESSER funds as match for AmeriCorps grants is permissible under applicable ED statutes and authorities. Therefore, ASN grantees may use ESSER funds as match for AmeriCorps funding.

Notwithstanding the foregoing, AmeriCorps does not permit grantees to use the same funds as match for two separate grants.

Sincerely,

A handwritten signature in cursive script that reads 'Sonali Nijhawan'.

Sonali Nijhawan  
Director, AmeriCorps State and National



UNITED STATES DEPARTMENT OF EDUCATION  
WASHINGTON, D.C. 20202

April 1, 2022

Dear Colleague:

I am writing in response to questions brought to the U.S. Department of Education (Department) regarding the permissibility of Department grantees and subgrantees using Federal funds granted by the Department—including annually appropriated funds and COVID-19 pandemic relief funds—as matching funds for AmeriCorps programs. In brief, a Department grantee or subgrantee may use program funds as matching funds for AmeriCorps programs.

AmeriCorps operates a variety of programs that bring people together to tackle the country’s most pressing challenges through national service, including in schools. In particular, AmeriCorps volunteers regularly support students in underserved districts in a manner that promotes equity and excellence, for example, by providing high-quality tutoring, mentoring, or coaching. This work of AmeriCorps members is particularly important for helping students recover from the impact of the pandemic and addressing their social, emotional, mental health, and academic needs.

Grantees and subgrantees have raised the aforementioned question because the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) provides that, “*except where otherwise authorized by statute*, costs must meet the following general criteria in order to be allowable under Federal awards: ... (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.” 2 C.F.R. § 200.403 (emphasis added).

Consistent with 2 C.F.R. § 200.403(f), the AmeriCorps statute and regulations provide the authority to use Department funds for such cost sharing or matching. 42 U.S.C. § 12571(e); 2 C.F.R. § 2205.306. **Accordingly, a Department grantee or subgrantee may use program funds as matching funds for AmeriCorps programs.**<sup>1</sup> This conclusion is based on the AmeriCorps statute and rule on the use of Federal funds for match and how these AmeriCorps governing authorities interact with Department statutes and regulations.<sup>2</sup> This conclusion also stems from close consultation with and consideration of the position of other relevant Federal agencies on this topic. All other relevant Uniform Guidance and applicable Federal requirements would apply, including that the cost is reasonable and necessary for an allowable activity, is consistent with the statutory purpose of each program or approved application, otherwise meets all programmatic requirements, and AmeriCorps agrees that funding from the Department would be considered as an acceptable source of matching funds.

The Department fully supports and encourages state and local partnerships with AmeriCorps programs, including many activities in support of student learning and success that are appropriate uses of education funds. Thank you for all that you do to support students, families, and schools during this challenging time.

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<sup>1</sup> This authority would be limited if a Department program expressly prohibits the use of funds for a cost share or match in another Federal program. We are not aware at this time of any such prohibition in Department programs whose funds would likely be considered for an AmeriCorps match.

<sup>2</sup> This guidance is based on the relevant statutory and regulatory authorities applicable to AmeriCorps and is limited to the use of Department funds as matching funds for AmeriCorps programs.



UNITED STATES DEPARTMENT OF EDUCATION  
WASHINGTON, D.C. 20202

I look forward to the partnerships that will develop and grow with AmeriCorps programs to provide additional supports to students in underserved districts.

Sincerely,

/S/

Roberto J. Rodriguez  
Assistant Secretary, Office of Planning, Evaluation and Policy Development  
U.S. Department of Education

[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*