

IMPACT REPORT

Review of Privacy Act Compliance Amid Staffing Cuts

September 9, 2025





IMPACT REPORT: PRIVACY ACT COMPLIANCE EXECUTIVE SUMMARY

AmeriCorps OIG plays a crucial role in protecting the integrity of national and community service. Pursuant to our oversight authority under the Inspector General Act of 1978, et. sec, and our dual reporting requirements to the Legislative and Executive branches, AmeriCorps OIG prepared this report to examine the impact of AmeriCorps' staff and funding reductions on agency costs, members, communities, and AmeriCorps' programs and operations. This report reviews reasons behind Privacy Act violations reported by AmeriCorps.

THE IMPACT



OPERATIONS: AmeriCorps violated the Privacy Act by sharing reduction in force notices that contained Personally Identifiable Information of two AmeriCorps employees with more than 300 AmeriCorps employees through an untested email distribution system. AmeriCorps acknowledged that the rush to attempt to send these RIF notices was due to an expedited timeline set by the Department of Government Efficiency team. The prior placement of AmeriCorps staff on administrative leave likely impacted AmeriCorps' ability to create and test the email distribution system based on standard protocols.

SCOPE: AmeriCorps OIG undertook this review to examine the impact of staff reductions on AmeriCorps' compliance with the Privacy Act..

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Introduction

About This Report

In May 2025, under our authority in the Inspector General Act of 1978, and consistent with our dual reporting obligations to the Legislative and Executive branches, the AmeriCorps Office of Inspector General (AmeriCorps OIG) began a series of reviews to assess the effects of the agency's April 2025 staff reductions on costs, members, communities, and agency programs and operations. To carry out this work, AmeriCorps OIG divided the effort into multiple reports. This report examines the impacts of staff reductions on AmeriCorps' compliance with the Privacy Act.¹ For more information about our Scope and Methodology, see Appendix A.

AmeriCorps²

AmeriCorps is a government corporation which administers the programs and activities established under the national service laws.³ AmeriCorps is the nation's largest issuer of grants for community service and volunteering, plays a critical role in strengthening the United States' non-profit sector, and addresses the nation's challenges through community service and volunteering. AmeriCorps awards grants and cooperative agreements to State commissions, nonprofit entities, and tribes and territories to assist in the creation of full-time and part-time national and community service programs. Through these grantees and other service initiatives, AmeriCorps provides services to meet educational, human, environmental, and public safety needs throughout the nation. In many cases, AmeriCorps' funding addresses gaps in communities across the country that private resources do not reach.

Pursuant to statutory authority, AmeriCorps operates various grant programs and service initiatives, including AmeriCorps State and National (ASN), the National Civilian Community Corps (NCCC), Volunteers in Service to America (VISTA), and AmeriCorps Seniors programs. AmeriCorps also operates the National Service Trust, a fund established by the National and Community Service Act of 1993 to pay for Segal Education Awards for those who have

FY 2025 Agency Appropriations

Salaries and Expenses
\$99,686,000

Trust
\$180,000,000

Programs/Operations
\$975,525,000

Total
\$1,255,211,000

¹ 5 U.S.C. § 552a.

² In September 2020, the Corporation for National and Community Service began doing business as AmeriCorps.

³ 42 U.S.C. § 12651; see 45 C.F.R. § 2500.2(a).

successfully completed approved terms of national service.⁴ In FY 2025,⁵ AmeriCorps employed over 700 individuals across the country.

⁴ The Segal Education Award is available to individuals who have successfully completed an AmeriCorps term of service. The award may be used to repay qualified student loans, and to pay current educational expenses at eligible institutions of higher education and training programs.

⁵ AmeriCorps' total FY 2025 agency appropriations, depicted above, do not include funds appropriated to AmeriCorps OIG.

Timeline of April 2025 AmeriCorps Staff and Funding Reductions

During FY 2025, AmeriCorps experienced significant changes to its staffing, structure, and grantmaking.

In February 2025, the President signed the Executive Order “Implementing the President’s ‘Department of Government Efficiency’ Workforce Optimization Initiative,” which ordered a transformation of the Federal government, to include plans for reductions in force (RIF) across Federal agencies and requiring consultation with a Department of Government Efficiency (DOGE) Team. Office of Personnel Management (OPM) then provided guidance to the Federal agencies on how to implement the President’s Executive Order.

APRIL 7, 2025
AmeriCorps offered second round of DRP

APRIL 8, 2025
DOGE at AmeriCorps HQ and announcement of RIF of up to 50% of staff.

APRIL 15, 2025
AmeriCorps initiates complete demobilization of NCCC

APRIL 16, 2025
AmeriCorps places almost 85% of staff on administrative leave

APRIL 18, 2025
AmeriCorps cancels 102 government contracts

APRIL 24, 2025
AmeriCorps issues RIF notices to 322 employees

APRIL 25, 2025
AmeriCorps terminates 1,000+ grants and places 30,000+ ASN and VISTA members on leave

In April, AmeriCorps conducted a large-scale RIF in response to the Executive Order and DOGE Team directives.

April 7. AmeriCorps offered a second round of the President’s Deferred Resignation Program (DRP) with an acceptance deadline of April 14.⁶

April 8. The Interim Agency Head emailed all staff that a DOGE Team had been assigned to AmeriCorps and was being welcomed that day at AmeriCorps headquarters. AmeriCorps’ DOGE Team was comprised of four individuals. One primary DOGE Team member (herein “DOGE Official 1”) acted as the primary contact to AmeriCorps’ senior officials. Later that same day, the Interim Agency Head sent an email to all staff stating that AmeriCorps was complying with the President’s Executive Order on workforce optimization, and that a RIF of 50 percent or more of staff would be executed.

April 15. AmeriCorps ordered a demobilization of all NCCC members. As part of this order, project sponsors and NCCC members were notified that all projects would end, and members would return to their campuses before being sent home, effective immediately.

April 16. AmeriCorps notified just under 600 AmeriCorps employees that they would be placed on administrative leave as part of a RIF effort. Of those, about half were AmeriCorps employees who had

⁶ Per OPM, the DRP was a February 2025 voluntary retirement program that provided government employees with eight months of paid leave. AmeriCorps first offered the DRP when it was originally announced by OPM on February 3, 2025.

elected to take the second-round DRP. Almost 85 percent of AmeriCorps staff were placed on administrative leave.

April 18. AmeriCorps cancelled 102 government contracts pursuant to guidance from the DOGE Team.

April 24. AmeriCorps issued RIF notices to 322 of the employees who were placed on administrative leave.

April 25. AmeriCorps terminated 1,031 grants across all of AmeriCorps programs totaling \$396,509,876⁷ in Federal funds and suspended the service of 30,393 ASN and VISTA members.

⁷ This amount represents the full grant award amounts of the terminated grants. However, as some of the grant funds had already been expended, this number does not represent the value of federal funds retained by the Government.

Impact on Operations

Due to AmeriCorps' staff reductions and a compressed timeline for notifying impacted employees, AmeriCorps acknowledged that it inadvertently violated the Privacy Act when RIF notices containing Privacy Act-protected information of two employees were sent to more than 300 staff members through an untested email system. AmeriCorps indicated that the rush to send the RIF notices was due to the short turnaround time requested by the DOGE Team and concerns that the DOGE Team could take additional punitive action against AmeriCorps if it did not issue the notices by a DOGE Team-set deadline.

The Privacy Act

The Privacy Act of 1974 requires Federal agencies to maintain and safeguard records regarding individuals contained within a system of record.⁸ Records include any item or grouping of information about an individual that is maintained by an agency, including, but not limited to, their education, financial transactions, medical history, and criminal or employment history and that contains their name, or other identifying information particular to the individual. Agencies are prohibited from disclosing any record to any person or agency without the individual's consent or under one of thirteen authorized exceptions.⁹

Civil and potential criminal liability apply to Privacy Act violations committed by Federal agencies.

AmeriCorps' Privacy Act Violations

Following the April 16 administrative leave actions affecting nearly 85 percent of AmeriCorps staff, 106 employees remained on duty. Those employees included 12 individuals in the Office of Information Technology (OIT), including the Acting Chief Information Officer and the Chief Information Security/Privacy Officer. This was an approximate 66 percent decrease from the 36 employees previously residing in OIT. Furthermore, only nine individuals remained in the now-combined Office of the Chief Risk Officer (OCRO), Office of Monitoring (OM), and Office of Audit and Debt Resolution (OADR)—an 81 percent decrease from the 47 employees in OCRO, OM, and OADR prior the placement of staff on administrative leave.

Following the placement of staff on administrative leave, DOGE Official 1 instructed the Interim Agency Head to conduct a large-scale RIF of AmeriCorps employees. At an April 18 meeting, DOGE Official 1 instructed AmeriCorps senior officials to send RIF notices for AmeriCorps employees by the beginning of the following week. Between Friday, April 18 and Wednesday, April 23, AmeriCorps officials, with the approval and oversight of DOGE Official 1, worked to review and modify the RIF list of AmeriCorps employees.

⁸ 5 U.S.C. § 552a.

⁹ 5 U.S.C. § 552a(b).

April 23, 2025

12:10 PM. The Interim Agency Head provided DOGE Official 1 with a final RIF list and requested information about the timing of sending the RIF notices. Throughout the day, the Interim Agency Head and DOGE Official 1 exchanged multiple emails to finalize the RIF notification. DOGE Official 1 requested that the notices be distributed that same day, imposing an end-of-day deadline on AmeriCorps.

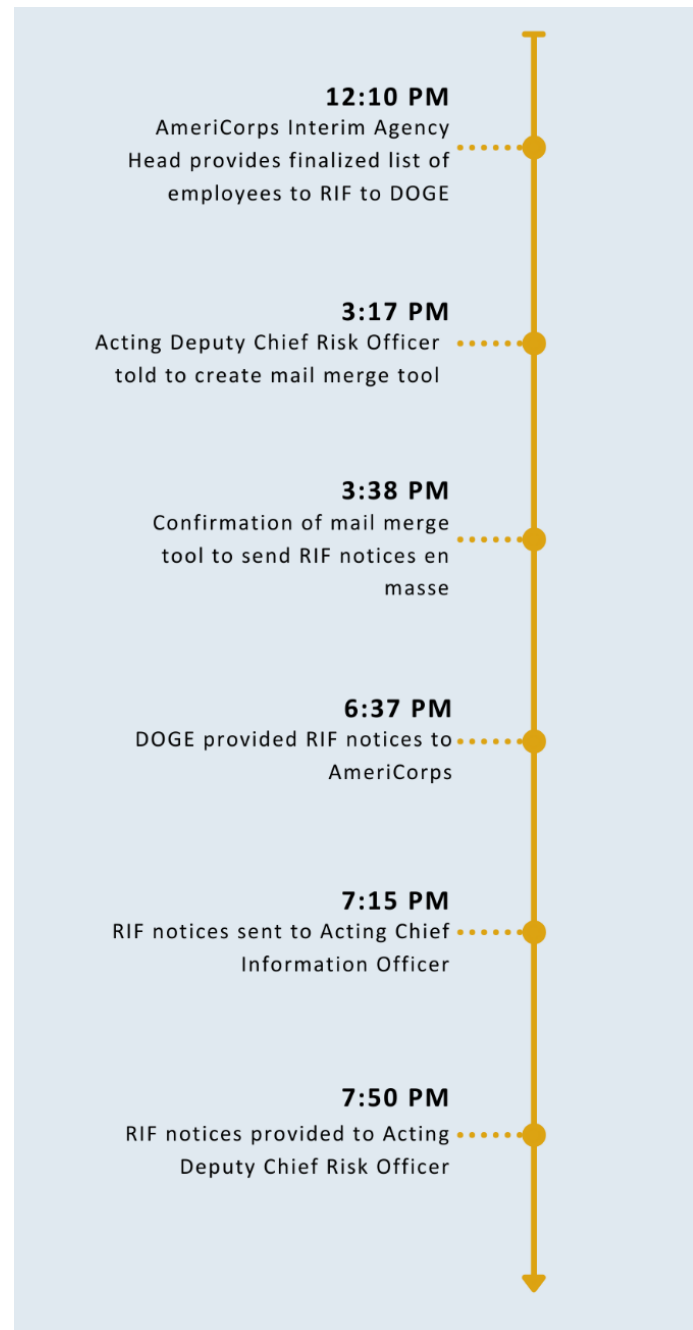
3:17 PM. The Acting Chief Information Officer messaged the Acting Deputy Chief Risk Officer to inquire about creating a mail merge tool to send out an email with attachments to over 200 accounts. The Acting Chief Information Officer did not share the context of the emails, only that they would have to be sent out that day. The Acting Deputy Chief Risk Officer had no specific details about the needed capabilities for the mail merge tool at this time. The mail merge tool would allow AmeriCorps to mass email the RIF notices to the correct individuals without having to send the emails one at a time. The program would pull the proper documents and send them with the corresponding email to the proper email addresses.

While the Interim Agency Head intended to send the RIF notices individually by email that evening, the Acting Chief Operating Officer recommended creating a tool to facilitate mass distribution.

3:38 PM. The Interim Agency Head sent an email to the Acting Chief Operating Officer, Acting Chief Information Officer, and Chief Information Security/Privacy Officer, confirming that they would create a tool to automate the process of sending the email notices.

6:37 PM. DOGE Official 1 provided the RIF notices to the Interim Agency Head as Portable Document Format (PDF) files.

7:15 PM. The Interim Agency Head provided the final RIF notices as PDF files to the Acting Chief Information Officer and the Chief Information Security/Privacy Officer with the requirement that all notices be sent that evening to the employees' personal and work email addresses.



7:50 PM. The Chief Information Security/Privacy Officer forwarded the email to the Acting Deputy Chief Risk Officer and requested that each RIF notice be sent to the respective employees' personal and work email address, indicating that the RIF notices should be provided as attachments.

The Acting Deputy Chief Risk Officer was the sole individual tasked with creating the mail merge tool that would be used to mass email the RIF notices. The Acting Deputy Chief Risk Officer built the tool throughout the evening and night of April 23. Due to staffing shortages and an expedited timeline, typical program creation protocols, such as conducting a peer review and performing testing, were not followed. The Acting Chief Information Officer remained available and in communication with the Acting Deputy Chief Risk Officer throughout the evening, but requirements of the task fell outside of Acting Chief Information Officer's area of expertise.

After being forwarded the RIF notices, the Acting Deputy Chief Risk Officer faced difficulties upon learning that the RIF notice files would be provided to employees as PDF files. According to the Acting Deputy Chief Risk Officer, a mail merge can be completed using Microsoft Excel and Word or using Microsoft Outlook and a script. However, a mail merge tool cannot reliably read PDF files with 100 percent accuracy.

April 24, 2025

1:20 AM. The Acting Deputy Chief Risk Officer reached out to the Acting Chief Information Officer to ask if they were ready to "push[] the button." The Acting Chief Information Officer liked the message and sent an email to the Interim Agency Head. The Acting Deputy Chief Risk Officer messaged the Acting Chief Information Officer, "ok, just testing one last piece."

Throughout the early morning of April 24, the Acting Deputy Chief Risk Officer conducted testing of the mail merge tool using test data. The Acting Deputy Chief Risk Officer arranged for the test data to be sent only to their personal email address.

8:45 AM. A test was run and an email containing a RIF notice identifying an AmeriCorps employee in the filename was sent to approximately 300 AmeriCorps employees' personal and work email addresses. The email was addressed to the Acting Deputy Chief Risk Officer and included a blank attachment titled as RIF Notice (AmeriCorps) and included the name of a specific AmeriCorps employee in the title (herein "Employee 1"). At the time, the Acting Deputy Chief Risk Officer was unaware that the name of Employee 1, via the attachment, had been distributed during the test, let alone that it had been inadvertently distributed to approximately 300 employees.

Throughout the rest of that morning, approximately 300 AmeriCorps employees received another email with an attachment, but this time the attachment was a fully executed RIF notice for a second and different AmeriCorps employee (herein "Employee 2") to the approximately 300 employees' personal and work email addresses. Employee 2's RIF notice included Employee 2's name, title, department, and RIF criteria (competitive area, type of service, work schedule,

position, pay plan-series-grade, competitive level, tenure group and subgroup, veterans' preference, and their last three performance ratings) as seen in the following image.

MEMORANDUM FOR: [REDACTED]

FROM: Jennifer Bastress Tahmasebi
Interim Agency Head

DATE: 4/24/25

SUBJECT: Specific Notice of Reduction in Force

I regret to inform you that you are affected by a reduction in force (RIF) action. This RIF is necessary for workforce reshaping (i.e. reorganization) of AmeriCorps.

This is your specific notice of RIF. In accordance with RIF procedures specified in Title 5, Code of Federal Regulations, Part 351, you are being released from your competitive level based on your retention standing. Consequently, you will be separated from the Federal service effective Tuesday, June 24, 2025. In the event you are qualified and have assignment rights to a position that becomes available during the notice period, you will be informed via a specific, subsequent RIF notice. Should the circumstances of the RIF otherwise change, this notice may be withdrawn.

Please contact RIFquestions@americorps.gov immediately if you believe any of the below information is incorrect.

Retention Standing

To conduct the RIF, retention registers were prepared which list employees in retention standing order by civil service tenure group and subgroup, veterans' preference, performance ratings, and length of Federal service. The following information was used to determine your retention standing as of the RIF effective date:

Competitive Area: [REDACTED]
Type of Service: [REDACTED]
Work Schedule: [REDACTED]
Position: [REDACTED]
Pay Plan-Series-Grade: [REDACTED]
Competitive Level: [REDACTED]
Tenure Group and Subgroup: [REDACTED]
Veterans' Preference: [REDACTED]
Last Three Performance Ratings:
2024: [REDACTED]
2023: [REDACTED]
2022: [REDACTED]

Adjusted RIF Service Computation Date (SCD): [REDACTED]

9:00-9:30 AM. The Chief Information Security/Privacy Officer learned that Employee 2's RIF notice had been distributed to approximately 300 AmeriCorps employees' personal and work email addresses.

Beginning around 10:00 AM. The Interim Agency Head, Acting Chief Operating Officer, and Acting Chief of Staff manually emailed 322 RIF notices out to the affected AmeriCorps employees.

AmeriCorps' Response to the Privacy Act Violations

Employees notified AmeriCorps management of the leaked Privacy Act-protected information, and the mail merge tool was terminated. AmeriCorps then attempted to recall the emails, but as the emails were sent to employees' personal email addresses, this was not entirely possible. At 12:05 PM on April 24, the Chief Information Security/Privacy Officer emailed employees to advise they had received an email that was inadvertently sent to them. Employee 2 responded to the Chief Information Security/Privacy Officer that they were the affected employee and that the disclosure was "unsettling."

On April 24, AmeriCorps' Chief Information Security/Privacy Officer notified the Department of Homeland Security's Cyber Infrastructure and Security Agency (CISA) of the leak of Privacy Act-protected information. CISA responded that no further action was required.

The Acting Deputy Chief Risk Officer prepared an after-action report to address the Privacy Act breach. The report noted that the mail merge tool, created using Power Automate, was developed under expedited circumstances with critical data requirements becoming available only hours before the DOGE Team-imposed midnight deadline.¹⁰ Additional changes were presented during the morning of April 24, along with data mismatches. The private data breach occurred during the testing phase of the mail merge tool which involved significant code modifications. AmeriCorps concluded that the root cause of the error in the tool was a "scope mismatch in the workflow design, where looped dataset references were impacted by last-minute code changes during testing." Contributing factors were noted to include "the expedited timeline, evolving data requirements, and the lack of additional support for testing or quality control during development." Appendix B summarizes relevant activities by key personnel.

AmeriCorps officials were acting under a compressed timeline based on the DOGE Team's instructions. Additionally, given that the administrative notices did not go out on April 23 as instructed, agency officials feared that the DOGE Team may take further action, including terminating all agency employees. To ensure no additional personal private information would be improperly distributed, and to avoid further delay in sending the notices by waiting for the mail merge tool to potentially work, the Interim Agency Head, Acting Chief Operating Officer, and Acting Chief of Staff sent the emails themselves.

Our review of the facts supports a conclusion that AmeriCorps violated the Privacy Act twice when sending out the required DOGE RIF notices. Although the DOGE Team timeline put pressure on staff to work under a tight deadline, the agency pursued a RIF notification process that violated employees' privacy by disclosing one employee's name and one employee's termination notice to hundreds of coworkers. Due to significantly reduced OIT and OCRO staff, AmeriCorps decided on a RIF notification process that relied on a single individual to create a mail merge tool within a matter of hours using incompatible data, *i.e.* the RIF notices as PDF

¹⁰ Power Automate allows tasks, such as distributing mass emails, to be automated.

files, and without performing proper testing and procedures. The individuals impacted by the Privacy Act violation had their information shared with their associates harming not only their reputation, but also their comfort at work and with their colleagues.

The evidence, however, does not support a finding that AmeriCorps knowingly and willfully disclosed the Privacy Act-protected information—the standard to prove intent required for Privacy Act criminal liability. The Privacy Act permits the affected employees to pursue a civil Privacy Act claim, which requires proof the agency acted intentionally or willfully, including conduct that exceeds gross negligence and causes damages.

Appendix A: Scope and Methodology

Scope

In May 2025, AmeriCorps OIG initiated a series of special reviews to assess the impact of AmeriCorps' April 2025 staff and funding reductions on agency costs, members, communities, and operations across AmeriCorps' programs or functions. To carry out this work, AmeriCorps OIG divided the effort into multiple reports. For this report, AmeriCorps OIG undertook a review based upon a complaint alleging a Privacy Act violation. AmeriCorps OIG reviewed the reasons for the violation and AmeriCorps' response, which were attributed to the April 2025 staff reductions.

Methodology

AmeriCorps OIG conducted interviews with AmeriCorps employees to discuss the Privacy Act violations and any external factors that led to the violation including reduction of staff, necessary resources, and DOGE. The overall methods we used to achieve the objectives included reviewing agency policies, procedures, and AmeriCorps records and communications.

Standards

AmeriCorps OIG prepared this report in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE's) Quality Standards for Federal Offices of Inspector General (Silver Book) and internal AmeriCorps OIG guidance, policies, and procedures. These standards required that we obtain sufficient and appropriate evidence to provide a reasonable basis for our insights and conclusions. This work was completed between May 2025 and August 2025.

Appendix B: Key Personnel

Interim Agency Head

- Worked with DOGE Official 1 to finalize list of employees to RIF.
- Received RIF notices in PDF from DOGE Official 1.
- Provided RIF notices to Acting CIO and CISO/CPO.
- Manually emailed finalized RIF notices to individual employees.

Acting Chief Information Officer

- Requested Acting DCRO create mail merge tool.
- Communicated with Acting DCRO throughout evening of April 23.

Chief Information Security/Privacy Officer

- Requested Acting DCRO send each RIF letter to respective employee.
- Learned that Employee 2's RIF notice had been distributed to approximately 300 people.
- Notified employees they received email in error.
- Notified CISA.

Acting Deputy Chief Risk Officer

- Built mail merge tool.
- Conducted testing of tool.
- Ran the test script which inadvertently sent emails with employee data.
- Prepared after-action report.

Acting Chief Operating Officer

- Suggested tool could be created to automate the sending of RIF notices.
- Helped manually email finalized RIF notices to individual employees.

Acting Chief of Staff

- Helped manually email finalized RIF notices to individual employees.