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THE INS AND OUTS OF DUPLICATION AND DISPLACEMENT

Operating an AmeriCorps program that includes duplication and/or displacement activities is a violation of Federal laws and regulations. Grantees and sponsors must be aware of and understand both of these terms:





Duplication: Using grant funds to duplicate an activity that is already available in the locality of a program. This includes activities that are the same or substantially equivalent to activities provided by a state or local government.

Displacement: The act of replacing or diminishing an existing employee, volunteer, or position to make room for an AmeriCorps participant. This includes cutting a worker's hours or benefits, reducing their promotion opportunities, or assigning a participant to duties normally handled by current, on-leave, striking, or recently departed staff.

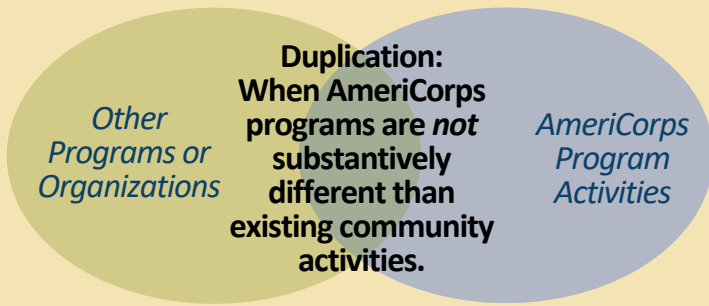
WHY SHOULD I PAY ATTENTION?

In cases where duplication or displacement is found, grantee programs may be deemed unallowable, federal funds may be recovered, and grantee organizations may be held liable for repaying unearned education awards.

RED FLAGS OF POSSIBLE DUPLICATION OR DISPLACEMENT

-  Employee Position Descriptions match Member/Volunteer Descriptions
-  Member/Volunteer titles are the same or very similar to employee titles
-  Members/Volunteers who are also employees of the organization where they serve
-  Members/Volunteers filling in for organization staff during absences or who are out on leave

Where do Duplication and Displacement Show Up?



Duplication requires an overlap between an AmeriCorps program's activities and an existing community program, whereas displacement occurs when there is overlap between the role of a member or volunteer and a grantee's existing staff/intern/volunteer roles. In both cases, these issues can show up by reviewing member or volunteer assignments and activities.

HOW DO YOU AVOID DUPLICATION OR DISPLACEMENT?

Ensure your project meets a unique need in the community and that participants, staff, and volunteers fill appropriate roles.

The recommendations below can also help your program to avoid common pitfalls.

DO...

- ✓ Ensure members/volunteers are only performing activities outlined in their VAD or Member Service Agreement.
- ✓ Be aware of services and activities in your area, especially those performed by state or local government programs that are similar to the activities of your program.
- ✓ Ensure member timesheets accurately reflect the activities that they've performed and indicate any time that is not connected to their AmeriCorps role.

DON'T...

- ✗ Assume that VADs and Member Service Agreements are OK to reuse - review them closely to ensure you're avoiding red flags of displacement and duplication that others may have missed.
- ✗ Rely on members/volunteers to fill gaps in staffing.
- ✗ Replicate an existing service in your community, even when the need is greater than that service can currently support, especially when that service is supported by state or local government resources.



THINGS THAT MAKE YOU GO HMMM



Look at the examples below. Which ones might be instances of duplication or displacement? Try circling words that might make you look deeper to decide if duplication or displacement might be happening.

Note: the examples should not be considered complete and comprehensive.

Answers are included at the bottom of this page.

- 1 A county run park clean-up has been very popular. Your organization has decided to use AmeriCorps volunteers to do park clean ups.
- 2 When the person who sits at the front desk calls in sick, everyone (including volunteers) takes equal turns covering the desk.
- 3 When a teacher cannot find a substitute, AmeriCorps members are used to cover their class.
- 4 To make up for budget shortages, all extracurricular activities are now supervised by AmeriCorps members.
- 5 State run meal resources cover most of your county. Your organization uses AmeriCorps volunteers to cover the remaining area.

1 (duplication), 3 (displacement), and 4 (displacement), are all examples of displacement or duplication.

Hmmm Answers:



WHEN DOES IT HAPPEN?

When drafting grant narratives, applicants should proactively review existing projects and position descriptions to avoid overlap.

GRANT APPLICATION



PROJECT BUDGET

Duplication and displacement can also show up in budgets when personnel costs decrease and member/volunteer roles increase.

Member assignments and VADs should be reviewed each time they are used to ensure that no activities described are instances of duplication or of displacement. This is especially important because staff responsibilities may change over time (displacement) as can available community resources (duplication).

MEMBER ASSIGNMENT/ VAD



DAY TO DAY ACTIVITIES

When members or volunteers engage in activities outside of their assignments, there can be a risk of both duplication or displacement. Timesheets should include sufficient detail connecting activities to approved assignments.

Progress reports should include descriptions of member/volunteer activities as well as performance measurement.

These reports should be reviewed to ensure that grantees are on track and not otherwise repurposing AmeriCorps members/volunteers or resources to activities not covered by the grant.

PROGRESS REPORTS



CASE STUDIES

OIG INVESTIGATES ASN PROGRAM FOR ENROLLING EMPLOYEES AS AMERICORPS MEMBERS

An AmeriCorps OIG investigation determined that a State Commission subgrantee school district with an ASN grant had enrolled four existing employees in its program as full-time AmeriCorps members. However, the duties that the employees performed as members were the same duties that they had performed as employees. Because of this, it was apparent that the grantee's actions displaced staff in violation of Federal laws and regulations.

The investigation also discovered that members' inked signatures appeared to be forged on initial member service agreements and were later replaced by MSAs containing electronic signatures.

As a result of the investigation, AmeriCorps and the State Commission found that no member serving in the program legally satisfied program requirements. Ultimately, the grantee was responsible for payment of almost \$20,000 in education awards. The grantee has had no further funding from AmeriCorps.

OIG INVESTIGATES VIOLATIONS OF NON-DISPLACEMENT REGULATIONS

An AmeriCorps OIG investigation determined that a VISTA program in Texas planned for and intentionally allowed VISTA members to perform prohibited activities, including allowing the VISTA members to perform direct service such as serving as medical scribes, patient advocates, medical assistants, a dental assistant, and pharmacy technicians filling and dispensing medication, knowing it was against AmeriCorps rules and regulations. The investigation found that five VISTA members displaced paid host site employees, volunteers, and interns.

For example, three VISTA members performed activities for the host site to fill employee roles that had been vacated by host site staff. The vacancies arose because the host site terminated employees who had complained that VISTA members were being asked to perform activities outside of their VISTA Assignment Descriptions (VADs) and performing direct services to clients.

As a result of our investigation, AmeriCorps initiated recoupment actions against the Grantee to collect over \$80,000, reflecting \$61,000 in living allowance payments and \$19,000 in education awards paid to VISTA members who were found to have violated non-displacement regulations.

Federal Laws and Regulations about Duplication and Displacement:

[42 U.S.C. §12637. Nonduplication and nondisplacement](#)

[§ 2540.100 What restrictions govern the use of Corporation assistance?\(e\) Nonduplication](#)

[§ 2540.100 What restrictions govern the use of Corporation assistance?\(f\) Nondisplacement](#)



SPOT THE DISPLACEMENT



Below are two lists of position activities, one for an AmeriCorps member and the other for staff.

Can you match up the activities that could show displacement?

Volunteer Assignment Activities:

1. Set up arts and crafts center each Monday morning.
2. Provide direct service and camper care for campers at Camp.
3. Familiarize yourself with the needs of the campers in your care. As appropriate, assist, instruct, and supervise campers in social and personal care skills.
4. Take inventory of snack supplies weekly and submit orders for additional supplies as needed.
5. Ensure campers are at the activities of his/her choice and encourage and assist campers to participate fully in activities, adapting activities as needed.

Staff Member Position Description:

- A. Facilitate their camper's day to day activities by accompanying them to activity areas and trips and providing adaptive support or direction and participating alongside them.
- B. Provide social support, personal care support, and mealtime assistance.
- C. Responsible for the direct care of our campers.
- D. Maintain an accurate attendance log of all campers.
- E. Provide weekly camp summaries to parents and be available for any questions.

Answers are at the bottom of the page.

Note: Displacement and Duplication can be nuanced. If you are unsure you should reach out to your primary point of contact at AmeriCorps for guidance.

WANT TO LEARN MORE?

For additional resources on this topic including LITMOS training courses, sample statements, and links to guidance documents, and to access the electronic version of this document use the QR code below:



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Report suspected instances of fraud, waste, and abuse to the Office of Inspector General's hotline by using this QR code:



Did you know whistleblowers are protected under federal law? To find out more about your rights as a whistleblower, [click here](#).

Spot the Displacement Answers: 2 and C; 3 and B; 5 and A are all possible examples of displacement.

