

## AmeriCorps Equity Action Plan

### **(1) Executive summary**

The Corporation for National and Community Service, operating as AmeriCorps, has a mission to improve lives, strengthen communities, and foster civic engagement through service and volunteering. Following the murder of George Floyd and inspired by the growing national conversation on racial injustice and structural inequities during summer 2020, AmeriCorps spearheaded a cross-agency initiative to evaluate and deepen our culture of diversity, equity, inclusion, and accessibility (DEIA). The goal of the 2020 DEIA Initiative was clear: *“The elimination of racial inequity and promotion of equal treatment of all within the AmeriCorps Family.”*

Through this work, the agency was positioned to address the challenges posed by the Biden Administration directives and priorities articulated on Jan. 21, 2021, in Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities. As expressed in our 200 Day Progress Report, building a robust culture of DEIA in national service is a top agency priority led by the Office of the Chief Executive Officer (CEO) and the senior leadership of the Agency Equity Team. Our Equity Action Plans outlined in this document represents only a fraction of our efforts and strategic initiatives to advance equity and support underserved communities.

Currently, we have identified five top line actions that reflect our current and future investments and key priorities. They are listed in order of priority and are as follows:

- **Advancing Civil Rights:** At the core of equity are the laws, regulations, and policies that serve as its foundation. We are committed to full compliance with these laws and ensuring our grantees have the necessary training and tools.
- **Recruiting and Retaining a Diverse Corps:** We must increase representation in our national service corps from the communities we serve. We plan to do this by providing greater access to national service opportunities and benefits for people from underserved communities.
- **Supporting Tribal Communities:** Our responsibilities to American Indians and Alaskan Natives and our nation-to-nation relationship with Tribal governments is driven by our Committee on Native American Affairs, which has supported our prioritized actions in this area to address longstanding barriers.
- **Addressing Limited English Proficiency and Ensuring Language Access:** Advancing equity through our resources and opportunities is impossible if they are not accessible. We must ensure that anyone, despite their level of English proficiency, can access our resources and service opportunities.
- **Increasing Equity in our Procurement Process:** Much of how we accomplish our mission has to do with the vendors and contractors we utilize. Their services, experience, and diverse backgrounds are critical to advancing equity at AmeriCorps.

### **(2) Summary of early accomplishments**

#### **Recruiting and Retaining a Diverse Corps**

- As a result of American Rescue Plan (ARP) funding, the agency was able to modestly increase the living allowance in our largest term-based volunteer program, AmeriCorps State and National. While this is not enough to adequately address the most referenced barrier to serving in our programs as reported in the Request for Information (see Action 2), it is a step in the right direction.
- AmeriCorps is piloting a Recruitment and Outreach Unit and hiring a Recruitment Manager, to be followed by other positions.
- The agency developed a dashboard to identify counties with high social vulnerability or high rates of deep poverty that are not served by AmeriCorps State and National and AmeriCorps Seniors respectively. We can now add a demographics overlay to better ascertain the populations impacted by federal investments. Another recently developed dashboard allows us to analyze the demographic makeup of our corps by county, state, and in some cases, the census tract.
- AmeriCorps State and National and AmeriCorps Seniors developed a Diversity Questionnaire that asks sponsors, project hosts, and grantees to provide demographic data for the people served by the organization or project, organizational staff, the organization's senior leadership, and the organization's board members. The Diversity Questionnaire will be incorporated into all notice of funding opportunities to allow AmeriCorps to report on the number of underserved individuals it anticipates impacting.

### **Supporting Tribal Communities**

- In April 2021, the agency formed a Committee on Native American Affairs with a Senior Advisor and Special Assistant dedicated to these efforts. The committee developed an action plan and established working groups to expand outreach and achieve outcomes.
- The agency extended the open time for the Tribal notice of funding opportunity and conducted a census of programs to set a baseline for Native engagement.
- In 2021, the agency brought in a contractor to train 80 staff in tribal cultural competency and made it available to all staff.

### **Addressing Limited English Proficiency and Ensuring Language Access**

- In Sept. 2021, we expanded language access by making English and Spanish live captions available on the platform we use to communicate with stakeholders.

### **Advancing Civil Rights**

- ARP funds will allow the agency to hire additional Civil Rights Office staff to support the member complaint process and training for grantees.

### **Other**

- The FY 2022 AmeriCorps State and National and AmeriCorps Seniors notice of funding opportunities incorporated this funding priority: "*Programs that actively engage in removing structural racial inequities, advancing racial equality, and increasing opportunity in order to achieve sustainable change in communities.*"

## **(3) Equity action plan**

### **Action 1: Advancing Civil Rights**

#### **A. Barrier to Equitable Outcome(s)**

Data from our discrimination complaint process suggests that grantees and sponsors need more extensive training on civil rights compliance. In a recent Request for Information, respondents reported that AmeriCorps needs to provide more or better DEI and sexual harassment training for grantees, sponsors, and members. Some members mentioned they faced racial discrimination and sexual harassment in their service experience and felt the organization did not provide enough support for minority groups. This was substantiated by our own Civil Rights Office data showing LGBTQ+ members make up about half of our current civil rights complaints. Additionally, requests for assistance from grantees and sponsors indicate they are struggling to find solutions for the inclusion of persons with disabilities.

Limited agency capacity has hindered the ability of program staff and the Civil Rights Office to implement additional proactive measures to ensure grantees and sponsors are aware of civil rights laws beyond the standard agreements to terms and conditions and are properly equipped to apply them. By statute and regulation, our different national service programs have distinct protocols for handling and reporting civil rights violations and reasonable accommodation with regards to national service members and volunteers. We are unable to require grantees and sponsor organizations to report complaints and outcomes to the Civil Rights Office. This impacts the ability to monitor compliance and resolve complaints early. Unresolved discrimination complaints and limited capacity for persons with disabilities are a barrier to retention of members and volunteers from underserved communities.

Grantees and sponsors are the first line of defense with regards to supporting members and handling discrimination complaints by policy and are required to have a mechanism to address them. However, the agency currently lacks the ability to gather data on the effectiveness of grantee anti-discrimination policies and procedures.

## **B. Action and Intended Impact on Barrier**

Compliance is only the beginning. Proactive prevention of discrimination is key to retaining members and volunteers once they have been recruited and ensuring equity for all who engage with national service. Several actions have already taken place, and many are underway, including the following:

- Training for grantees and sponsors, especially those with limited resources, on how to create a more inclusive and accessible service environment, which will prevent complaints and ensure civil rights laws are being followed.
- Developing technical assistance resources for grantees and sponsors in the areas of proactive prevention of discrimination complaints and creating accessible service environments for persons of differing abilities.
- Adding staff to the Civil Rights Office to provide the training needed and to process complaints more quickly when they are not resolved at the grantee and sponsor level.
- Adding a Disability/Accessibility Program Manager to the Civil Rights Office to support programs, members, volunteers, and grantees.

- Adding civil rights requirements to the monitoring guide and publishing agency regulations in the Code of Federal Regulations (CFR), which specify civil rights reporting requirements to the agency.
- Piloting additional ways to resolve service member complaints such as an ombuds program for alternative dispute resolution for members, in addition to the formal discrimination complaint process.

### **C. Tracking Progress**

- Near to mid-term indicators (Output based within four years):
  - Additional staff resources secured for the Civil Rights program.
  - Increased training programs for grantees and sponsors are implemented and effectiveness of training is tracked through complaint activity and retention rates.
  - A pilot ombuds program for service members that is a complement to the discrimination complaint process.
  - The development of an accessibility pilot program.
- Long-term indicators (Outcome based within eight years):
  - Changes to relevant CFR provisions to improve the quality and timeliness of the processing of discrimination complaints from service members.
  - Integration of the reporting of discrimination complaints filed and resolved at the grantee and sponsor level into monitoring requirements.
  - Evaluation impact of accessibility pilot project and begin enterprise-wide, permanent implementation of practices that yielded results.

### **D. Accountability**

AmeriCorps will hold regular feedback sessions with internal and external stakeholders to gauge success of measures taken. The Civil Rights Director will be accountable for implementation of the action items. Progress towards meeting this annual goal will be reported semi-annually to the Chief Executive Officer and the Agency Equity Team and annually in an equity report that will be made available to the public.

## **Action 2: Recruiting and Retaining a Diverse Corps**

### **A. Barrier to Equitable Outcome(s)**

In July 2021, in accordance with EO 13985, AmeriCorps published a Request for Information (RFI) in the Federal Register and invited public comment from any interested party, including current and former AmeriCorps program award recipients, regarding any barriers that they, or the communities they serve/served, face/faced in accessing benefits and services offered by AmeriCorps programs. We received an unprecedented 625 comments. Our analysis shows that the majority of respondents in a randomly selected sample of 200, mentioned the living allowance amount as a barrier. Respondents felt strongly that the compensation, namely the living allowance, was too low, that it had consequences for members' national service experience and their ability to serve, produced barriers for enrollment, and perpetuated inequities. The lack of or difficulty to accessing benefits and the need to provide more accommodations for disabled members were other barriers raised by respondents.

Finally, the RFI also revealed barriers related to the promotion of AmeriCorps programs with a focus on the lack of promotion for younger audiences. Our own analysis of recruitment shows a consistent decline in recruitment numbers since 2008 and variation of diversity across our programs. Underserved groups are impacted by these challenges as evidenced by the makeup of our volunteer corps.

The topline issues identified in the RFI were further brought to our attention by one of our largest grantee associations in a written response to our RFI and their overall equity recommendations to the agency.

The recruitment and retention of a diverse pool of individuals and organizations who are inspired to serve their communities is essential to the mission of the agency. Overall, recruitment in general is hindered by challenges such as a strengthening economy, a competitive job market, outdated technology, and years of under-investment in recruitment infrastructure. Equity in our recruitment and retention faces additional challenges, including a living allowance that makes it difficult for low-income individuals to serve and a varying recruitment structure that creates imbalance in resources and support.

### **B. Action and Intended Impact on Barrier**

The agency is heavily invested in recruiting and retaining a diverse corps of members and volunteers. It serves as one of the major pillars in our DEIA initiative and is built into our strategic planning efforts. Our efforts began last summer and included a comprehensive assessment and recommendation process. Several actions have already taken place, and many are underway, including the following:

#### *Program Benefits*

- Increasing program accessibility for members with disabilities by supporting grantees and ensuring benefits.

- Improving benefit communication and identifying opportunities to support member professional development.

#### *Recruitment Support*

- Establishing an AmeriCorps recruitment team and developing intentional strategies to improve diversity through outreach and improved ease of access.
- Enhancing data collection efforts to better understand our corps and isolate challenges.
- Conducting outreach to build an even more diverse portfolio of grantees and sponsors that promote and support equity and inclusion.

### **C. Tracking Progress**

Factors the agency will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above include:

- Near to mid-term indicators (Output based within four years):
  - Full staffing of the new Outreach and Recruitment Unit to centralize and strengthen marketing, outreach, and recruitment across programs.
  - Increase in partnerships to help generate a diverse pool of candidates, grantees, and sponsors.
  - Increase in member living allowance.
- Long-term indicators (Outcome based within eight years):
  - Increase in diversity of members and volunteers.
  - Increased retention rates of underserved members and volunteers.

### **D. Accountability**

These actions are encapsulated within the agency's draft strategic goals:

- Goal #1: Partner with communities to advance racial equity and alleviate poverty
- Goal #2: Enhance the experience for AmeriCorps members and AmeriCorps Seniors Volunteers
- Goal #3: Uniting Americans by bringing them together in service

The Recruitment Manager will work in conjunction with the Office of External Affairs, the Chief Diversity and Inclusion Officer, and programs to develop strategies and construct intentional communication pipelines for both internal and external stakeholders. The Chief Diversity and Inclusion Officer will be accountable for implementation of the action items. Progress towards meeting this annual goal will be reported quarterly to the Chief Program Officer and the Agency Equity Team and annually in an equity report that will be made available to the public.

## **Action 3: Partnering with Native Communities**

### **A. Barrier to Equitable Outcome(s)**

Indian Country has been historically disinvested in and under-resourced by the federal government. While AmeriCorps funds Tribes, Tribal entities, and Native-led nonprofits,



the agency's Tribal portfolio has shrunk in recent years and our grantmaking has historically underproduced against the one percent set aside allotted to federally recognized Tribes. Barriers that contribute to this equity issue include inadequate technical assistance, ineffective or low outreach to Tribes and Native communities, lack of staff resources devoted to developing partnerships in Indian Country, and a general lack of focus on partnering with and serving Indian Country.

## **B. Action and Intended Impact on Barrier**

In April 2021, the agency formed the Committee for Native American Affairs (CNAA) which is comprised of staff from across the agency, including the portfolio managers who work directly with our Tribal grantees and AmeriCorps members and volunteers. The CNAA is the body responsible for driving the direction of Tribal engagement and Native American Affairs across the agency. The CNAA has established three primary goals and the activities the committee and the agency will undertake over the next three years to achieve success. The agency intends to devote two full-time staff to this body of work. These goals serve as the actions that the agency will undertake and are as follows:

- Reduce barriers to service in Indian Country and among Tribes and Tribal entities
  - Conduct outreach to gain a better understanding of barriers to accessing and maintaining AmeriCorps resources from prospective, current, and former grantees and sponsors, and develop an ongoing feedback mechanism.
  - Review internal policies, documents, practices, and update them to better support tribal applicants and grantees.
- Grow AmeriCorps' investment in Indian Country
  - Increase funding for Indian Country across AmeriCorps.
  - Provide robust support, tools, and trainings for potential grantees, partners, and sponsors in Indian Country.
  - Engage in proactive outreach to Tribes/Tribal entities, including developing and maintaining updated multi-format outreach materials that celebrates successes in Indian Country.
- Increase staff collaboration, expertise, capacity, and interagency partnerships with regards to Native Americans/Alaskan Natives.
  - Provide trainings and resources to staff to increase staff expertise and capacity.
  - Build and maintain collaborative relationships across the government to support Tribal affairs; this includes coordination with the White House Native American Affairs Committee.

## **C. Tracking Progress**

Factors the agency will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above include:

- Near to mid-term indicators (Output and outcome based within four years):
  - Agency has updated its policies, documents, and practices to minimize barriers to applying and maintaining AmeriCorps resources.
  - Increased access to training and resources specific to Tribes and grantees and sponsors supporting Indian Country.
  - Increased access to Native Affairs-related trainings for staff.

- Long-term indicators (Outcome based within eight years):
  - Increased number of tribal/Native-supporting applicants.
  - Increased numbers of tribes/Native-supporting entities engaged in administering AmeriCorps programs.
  - Increased satisfaction reported from both AmeriCorps members and Tribal awardees.

#### **D. Accountability**

A Special Assistant for Native American Affairs will work closely with agency's acting Strategic Advisor for Native American Affairs and Committee on Native American Affairs to carry out these actions as well as increase communication, consultation, and collaboration with Tribes and Tribal Agencies. The Special Assistant will work in concert with the Office of the CEO to support the partnerships and planning required to execute the action plan. We have aligned these actions with the goals and objectives of our upcoming strategic plan. Furthermore, it is our intention to share our progress with stakeholders via an annual report. The Acting Strategic Advisor for Native American Affairs will be accountable for implementation of the action items. Progress towards meeting this annual goal will be reported quarterly to the Chief of Staff and the Agency Equity Team and annually in an equity report that will be made available to the public.



## **Action 4: Addressing Limited English Proficiency and Ensuring Language Access**

### **A. Barrier to Equitable Outcome(s)**

Limited English proficiency and lack of language access are barriers affecting all people who speak English as a second language, which are mainly minority groups and underserved populations. Lack of language access restricts the ability of the affected populations to apply for grants, membership, and benefits. The language barriers also prohibit grantees from providing effective service. Our limited English proficiency (LEP) guidance is outdated and has not been updated since 2002. Current guidance does not account for recent technological advances. The public website and captioning of training sessions are two major technology areas needing improvement. Our largest English as a second language population speaks Spanish, and many of our documents are not translated. Grantees are responsible for making language access available to the LEP populations by first identifying the populations where language assistance is needed and ensuring their program materials are available in the identified languages. Underfunded grantees may not have the resources to provide large scale language access, which creates a barrier to full and equal participation for those with limited English proficiency. The agency's failure to provide language access resources to smaller grantees with limited resources can limit the agency's ability to increase access to underserved populations and communities.

### **B. Action and Intended Impact on Barrier**

The agency is in the process of providing the resources for translation (printed documents) and interpretation (real-time language assistance). The agency is seeking ways to provide Spanish translation and interpretation for onboarding training. The agency is also seeking linguistically appropriate technical assistance for grantees who speak English as a second language during compliance reviews and other requests for information, such as clarifications during grant competitions. We will prioritize this effort as we look to expand diversity among our service members and grantees. The agency has set aside program funds to hire a dedicated staff member focused on translation services housed in the Office of the Chief Program Officer and has prioritized supporting small scale and underfunded grantees as part of our FY 2023 DEIA budget. The agency will notify grantees that such assistance is available and develop procedures for fulfilling requests for assistance.

This action is being prioritized because it is a way to quickly address an identified barrier to accessing programmatic benefits for underserved grantees and the populations to which they provide services.

The actions are expected to reduce the identified barrier by making it easier for LEP candidates to apply to participate in the agency's programs by being able to complete applications in their primary language, as well as the training needed to serve. For smaller and underfunded grantees providing service to underserved populations, reducing the financial burden associated with providing translation and interpretation services will allow them to expand their reach into those communities. It will also allow such grantees to engage more LEP service members in their constituent communities.

### **C. Tracking Progress**

Factors the agency will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above include:

- Near to mid-term indicators (Output based within four years):
  - Completing the engagement of translation and interpretation services by funding the Interagency Agreement.
  - Keeping track of the readily available translated materials, providing them on demand, and adding more as needed, based on requests the agency receives from the public and grantees.
  - Monitoring frequency of use of translation and interpretation services, and the funds set aside to assist grantees with those services.
  - Hiring a Project Manager for Translation Services.
- Long-term indicators (Output and Outcome based within eight years):
  - Increasing the number of grantees and sponsors with limited English proficiency that have access to our resources.
  - Increasing the number of members and volunteers with limited English proficiency.
  - A permanent library of translated materials accessible to our grantees for recruitment and retention purposes and streamlined processing to fill in identified gaps.

### **D. Accountability**

The agency is hiring a position to oversee translation and interpretation services for our Programs. This position will report to our Chief of Program Operations, supporting our internal and external stakeholders. Developing a budget request earmarked for LEP services for the next fiscal year and updating the LEP policy guidance for grantees will hold us accountable to the above-mentioned practices. The Chief of Program Operations will be accountable for implementation of the action items. Progress towards meeting this annual goal will be reported quarterly to the Civil Rights Office Director and the Agency Equity Team and annually in an equity report made available to the public.

## **Action 5: Increasing Equity in our Procurement Process**

### **A. Barrier to Equitable Outcome(s)**

Historical data challenges have impacted the agency's ability to accurately monitor and track procurement activities with businesses owned or operated by women, minorities, veterans, and socioeconomic programs pursuant to the Federal Acquisition Regulation (FAR). Inadequate market research has led to stakeholder resistance to set aside

contracts to prioritize small businesses and businesses owned or operated by women, minorities, veterans, and other FAR socioeconomic programs. This is due to a common misconception that these businesses are incapable of performing in the same capacity as large businesses. Additionally, there is a lack of access to a centralized network of businesses to which to post opportunities. As a result, there is a low level of contracts awarded to diverse businesses owned or operated by women, minorities, veterans, and other FAR socioeconomic programs.

This barrier meaningfully impacts full and equal participation given the bias that does not afford these businesses a fair opportunity to compete for contracting opportunities.

## **B. Action and Intended Impact on Barrier**

The Office of Procurement Services will continue to engage in training sessions with Contracting Officer's Representatives and agency leadership to reduce bias in the procurement process. This includes:

- Requesting the Small Business Administration (SBA) present training sessions on how businesses owned or operated by women, minorities, veterans, and socioeconomic programs pursuant to the FAR benefits the government in supporting the agency's mission.
- Demystifying the SBA 8a business assistance program for small, disadvantaged businesses within the agency and inviting small businesses to present to agency stakeholders.
- We are currently putting processes in place to utilize General Services Administration (GSA) schedules. In 2022, we have met with GSA about the possibility of using their schedules for three new actions. We have established regular meetings with our GSA point of contact to understand options and they are becoming a routine piece of our acquisition market research.
- The Chief Operating Officer, Director of Procurement, and Director of Government Relations attended the U.S. Department of Agriculture's Revised Acquisition Planning Process, which included acquisition leadership across the government with a focus on increasing contracting opportunities to diverse small businesses.
- Along with additional agency leadership, the Director and Deputy Director of Procurement attended the agency's Tribal Cultural Competency Training led by an American Indian woman-owned SBA certified 8(m) small business. The objective of this training was for participants to gain a greater understanding of American Indian and Alaska Native (AI/AN) tribes, communities, and cultural factors as they relate to managing grants, as well as tribal program design and implementation. The understanding gained will assist procurement in our outreach to AI/AN tribes.
- Actions to lesson bias are prioritized because there will potentially be a greater impact in the number of contracts awarded to businesses owned or operated by women, minorities, veterans, and socioeconomic programs pursuant to the FAR. Stakeholders' lack of understanding that these businesses are also capable of providing goods and services causes a low level of confidence in the businesses' performance. Consequently, procurement faces resistance in setting aside requirements. By addressing the root issue of barriers, fairness and equity in contracting will increase.

- Office of Procurement Services will also provide links and information related to the Procurement Technical Assistance Centers to assist new small business contractors with access and to increase the agency's comfort in relying on small business contractors.

### **C. Tracking Progress**

Factors the agency will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above include:

- Near to mid-term indicators (Outcome based within four years):
  - A minimum of 10% of total annual contract volume (benchmark against other federal agencies and above average based on analysis) is set-aside for:
    - Small businesses and FAR socio-economic programs.
    - Businesses' self-identifying as a small or other underrepresented business.
    - Large businesses subcontracting plans with small businesses preference language included in solicitations where feasible.
- Long-term indicators (Outcome based within eight years):
  - A robust partnership with the Small Business Administration with the agency's active participation in 8a and joint venture programs.
  - Diverse businesses are consistently receiving a minimum of 10% of the agency' total annual contract volume.

### **D. Accountability**

In addition to continuing to increase awareness of and reenforcing FAR requirements and compliance, the agency will commit to incorporating increased equity in contracting by including a tactic as part of its Strategic Plan. The Director of the Office of Procurement Services will be accountable for implementation of the action items. Progress towards meeting this annual goal will be reported Semi-annually to the Chief Operating Officer and the Agency Equity Team and annually in an equity report that will be made available to the public.