



**AmeriCorps**

# **Executive Order Compliance Instructions**

February 13, 2025

## Table of Contents

Background .....	1
Timeline.....	1
Overview .....	1
Procedure .....	2
State Commission Instructions .....	5
Frequently Asked Questions .....	5
Appendix .....	7

## Background

As shared in an email sent by Carly Bruder, Acting Chief Program Officer on February 11, 2025, AmeriCorps is continuing to review all applicable executive orders, memoranda and corresponding guidance issued since January 20, 2025, by President Trump, the Office of Management and Budget and the Office of Personnel Management.

The agency is reviewing all current AmeriCorps awards to ensure compliance with these directives and administration priorities. This document includes guidance on next steps in this process to ensure compliance with these directives.

## Timeline

All grantees must respond to the Executive Order Compliance email by **February 19, 2025**, by submitting one of the following: a self-certification statement, a grant amendment to move your program into compliance with the executive orders, or a relinquishment letter. Your response to the Executive Order Compliance email should be sent to your Portfolio Manager and cc the region inbox for your state. In rare circumstances extensions to this deadline may be approved by regional office staff upon request.

## Overview

AmeriCorps conducted a review of active grants to identify activities described in each grant application that may not comply with executive orders.

All aspects of AmeriCorps grants/awards must comply with President Trump’s executive orders, including, but not limited to:

- Grant applications for AmeriCorps resources
- Activities performed by AmeriCorps members/volunteers
- Training provided to members/volunteers
- Program materials, such as volunteer/member applications, enrollment forms, service opportunity listings, and handbooks

- Social media and website posts about your AmeriCorps award

Grantees/sponsors must also ensure all sub applicants/volunteer stations/operating sites/host sites are compliant with executive orders through their memorandum of understanding and subsite monitoring.

The agency sent one of two letters for each project, one for grants that appear to be in compliance with the executive orders or a second for grants that include language that may not be in compliance.

## Required Responses

If your organization received the first letter - Titled, "Executive Order Self-Certification Required," then:

- Your organization can self-certify that this award (meaning all aspects of the grant activities described in the application and carried out under this grant, as described above) is in compliance. If you believe this award is not in compliance with the executive orders outlined in Appendix A, you may request to amend your grant or consider relinquishment.

If your organization received the second letter - Titled, "Executive Order - Potential Noncompliance," then:

- Your organization must review the sections that are identified in the letter as potentially being noncompliant.
- If your review determines the award (meaning all aspects of the grant activities described in the application and carried out under this grant, as described above) is compliant with executive orders, you can self-certify for this award.
- If any of the program activities are not in compliance with the executive orders, you must submit an amendment to the award to move it into compliance by **February 19, 2025** or email by **February 19, 2025** expressing an intent to relinquish

**Amending the application (s) (and potentially VADS for VISTA):** If your project **is** conducting noncompliant activities within the scope of your approved grant(s), and you wish to remain an AmeriCorps grantee/sponsor, then you must cease these activities immediately, initiate an amendment to your most recent award and remove or update any language related to out of compliance activities. If you have multiple awards, you must update each application that had findings.

**Relinquishment:** If your project **is** conducting noncompliant activities within the scope of your approved grant(s), and you wish to relinquish, then you must email the Regional Office by **February 19, 2025** expressing intent to relinquish. The Regional Office will provide additional instructions upon receipt.

## Procedure

### Self-Certification Instructions

To self-certify, your organization must review the executive orders in Appendix A and affirm that your AmeriCorps grant/award complies with President Trump’s executive orders. If any language from your application is highlighted as requiring clarification in the attached letter, please review this section of your application to determine whether it conflicts with any executive orders and make updates as necessary. If you determine your project is in full compliance and the narrative (and VAD for VISTA projects) complies with the executive orders, you must email your Portfolio Manager and cc your region-specific mailbox listed below with the following statement:

- [MidAtlantic@americorps.gov](mailto:MidAtlantic@americorps.gov)
- [Midwest@americorps.gov](mailto:Midwest@americorps.gov)
- [Mountain@americorps.gov](mailto:Mountain@americorps.gov)
- [NorthCentral@americorps.gov](mailto:NorthCentral@americorps.gov)
- [Northeast@americorps.gov](mailto:Northeast@americorps.gov)
- [SouthCentral@americorps.gov](mailto:SouthCentral@americorps.gov)
- [Southeast@americorps.gov](mailto:Southeast@americorps.gov)
- [West@americorps.gov](mailto:West@americorps.gov)

“I certify that [Program Name], [application ID] complies with all administration Executive Orders and does not include any activities that promote DEI activities.”

If any activities outlined in your application or VADS do not fully comply with the executive orders, you cannot self-certify, and must amend your grant or relinquish the award.

### **Amending your award to address non-compliance**

If you need to amend your award to comply with the executive orders, your organization must initiate an amendment in eGrants.

Selecting amendment types: The amendment types that are relevant for this work are: Modify Performance Measures or Workplans, Revise Budget, and Revise Narrative. Consider what amendment types will be necessary to make all your proposed changes.

Existing amendments: If you already have an existing amendment open on a grant, you can combine this amendment with your current amendment if it can be completed by **February 19**. If you cannot complete an open amendment by **February 19**, please delete that amendment and create a new one for this process.

**VISTA Sponsors** may also need to amend the VISTA Assignment Description (VAD) to comply with the executive orders, and these also must be initiated through eGrants by your organization by **February 19, 2025**.

**Volunteer Generation Fund** grantees funded through American Rescue Plan will need to update their recently submitted FY 25 VGF ARP Continuation application. VGF ARP grantees will not submit an amendment but will make changes directly to their application once the Portfolio Manager has returned it in eGrants. If you have resolution items that were identified

during the initial review, please complete them at the same time as addressing EO non-compliance.

Links to grantee amendment award processing guidance by program:

- [AmeriCorps Seniors, VISTA, Volunteer Generation Fund, and Days of Service Amendment to Modify Grant Award Guidance](#)
- [AmeriCorps VISTA Amendment to VISTA Assignment Description \(VAD\) Guidance](#)
- [Initiating, Processing, or Requesting Post-Award Amendments on ASN Awards](#)

Grantees may make any necessary changes to the application to bring it into compliance so long as it complies with all program policies and requirements. This may require changes to staff roles and activities, member or volunteer roles and activities, trainings, service sites, performance measures, budget and any other components of a program that may conflict with the executive orders. Amendments to move into full compliance are due by **February 19**.

### **Relinquishment Instructions**

If your organization determines that your AmeriCorps project cannot be brought into compliance or that your organization no longer wishes to operate this project with AmeriCorps funding, please send a letter by **February 19** to your portfolio manager, with a copy to your region-specific mailbox listed below, indicating your intention to relinquish this award. Please include the grant number and proposed end date.

Your Regional Office will set-up a meeting with you to review the status of the grant funds for close-out. The grantee is responsible for completing the final project progress report and financial reports.

Region Mailboxes for cc:

- [MidAtlantic@americorps.gov](mailto:MidAtlantic@americorps.gov)
- [Midwest@americorps.gov](mailto:Midwest@americorps.gov)
- [Mountain@americorps.gov](mailto:Mountain@americorps.gov)
- [NorthCentral@americorps.gov](mailto:NorthCentral@americorps.gov)
- [Northeast@americorps.gov](mailto:Northeast@americorps.gov)
- [SouthCentral@americorps.gov](mailto:SouthCentral@americorps.gov)
- [Southeast@americorps.gov](mailto:Southeast@americorps.gov)
- [West@americorps.gov](mailto:West@americorps.gov)



## State Commission Instructions

The email you received included letters for your commission grants and a spreadsheet with review results for your subapplicants. You must review the grants referenced in the letters and self-certify they comply with all executive orders. To self-certify grants awarded to your commission, i.e.: CSG, CIF, VISTA, you must follow the above self certification, amendment, or relinquishment instructions.

To certify your subapplicant portfolio, you must use the attached spreadsheet.

For subapplicants included on the No Compliance Issue Identified tab you must certify that these sub applicants comply with all Executive Orders by:

- Copying and pasting the appropriate response next to each listed sub application:
  - I certify that [Program Name], [Application ID] complies with all administration Executive Orders and does not include any activities that promote DEI activities **OR**
  - The sub application is currently **noncompliant** within the scope of approved grant activities and requires an amendment to ensure compliance. The commission will inform the PM and initiate the amendment **OR**
  - This sub application must be relinquished. The commission will initiate this process.

For subapplicants included on the Potential Compliance Issue Identified tab you must:

- Instruct the program to immediately stop all noncompliant activities.
- The program must immediately initiate an amendment in eGrants to remove the noncompliant language and/or activities from their application.
- If the program chooses not to amend its grant to bring it into compliance it must relinquish its award.
- If you feel this assessment was in error, you must note this on the provided spreadsheet and in the Notes column self-certifying that the project is in compliance.

You must reply all to the email you received, including your Portfolio Manager *and* the region specific mailbox attaching the spreadsheet with your responses recorded. You must respond by **February 19, 2025** with the information requested. Nonresponse may result in the termination of your awards.

## Frequently Asked Questions

**Q1: In what scenarios can a grantee get approved for an extension to this deadline?**

Extensions could be granted if you have an extenuating circumstance such as scheduled leave or your internal process for approval from authorizing representative takes longer than the timeline allows. Please reach out to your Regional Office Staff to request an extension.

**Q2: How much can a grantee change the application and program model to come into compliance?**

Grantees are encouraged to make all necessary changes to come into compliance so long as the changes align with the funding notice. This may require changing staff roles and activities, member or volunteer roles and activities, trainings, service sites, performance measures, and any other components of a program that may conflict with the executive orders.

**Q3: The letter shared language that needed clarification. If I've reviewed the specified language in the context of my application, and it complies with executive orders, do I need to remove the language?**

No, if your review assessed that your application, as is, complies with the executive orders, no changes are needed, and your organization can self-certify.

**Q5: Can our Portfolio Manager or Regional Staff review our narratives before we submit an amendment?**

Due to the short timeline, regional office staff will have limited capacity to respond to individual requests and will not be able to review individual grant narratives before the **February 19** deadline. Grantees are responsible for ensuring that their application and program complies with President Trump's executive orders.

**Q6: If I choose to relinquish, can I finish the grant year?**

Only if you can certify that your program complies with executive orders, or you amend your grant to be fully compliant within the timeline provided.

**Q7: (ASN and VISTA) Am I able to transfer members to other operating sites or programs with available MSYs should my amendment require removing specific member activities?**

Yes., please contact your Regional Office staff for guidance on this process.

**Q8. Can I initiate multiple amendment types at the same time?**

Yes. You may select more than one type when initiating an amendment. You cannot have two amendments open at the same time.

**Q9. Can we change the number of MSY, VSY, or volunteers associated with this application?**

ASN grantees: Grantees are encouraged to fully enroll all MSY they have been awarded. It is allowable to enroll fewer members if necessary to comply with the administration's executive orders.

ACS grantees: Grantees may reduce VSY for positions that are deemed as non-compliant due to the administration's executive orders. Volunteer positions not included in performance measures and volunteers engaged in Other Community Priority performance measure who are engaged in non-compliant activities must also stop. VSY reduction for any other reason is not allowed. A reduction in VSY requires budget revisions.

### **Q10. If I relinquish my grant, can my members be exited for compelling personal circumstances?**

Yes. For ASN grantees, if you relinquish your grant, your members may be exited for compelling personal circumstances. Per CFR 45 CFR 2522.230(a)(4)(C), members may be released from completing a term of service for . . . "Conditions attributable to the program or otherwise unforeseeable and beyond the participant's control, such as a natural disaster, a strike, relocation of a spouse, **or the nonrenewal or premature closing of a project or program**, that make completing a term unreasonably difficult or impossible;" You must document the reason for the members compelling personal circumstances exit, including that the member could not be placed in another program.

For VISTA sponsors, please contact your Portfolio Manager regarding any members that may need to exit the project early.

## Appendix

### **What is an Executive Order?**

The President of the United States manages the operations of the Executive branch of government through executive orders and memoranda. Executive orders and memoranda are written directives, signed by the president, that order the government to take specific actions to ensure "the laws be faithfully executed."

Information about presidential actions, including executive orders is available on the [White House website](#).

### **What part of my AmeriCorps grant must comply with Executive Orders?**

AmeriCorps, as part of the Executive branch of government, must comply with all applicable executive orders and memoranda. No AmeriCorps funding may be spent on any activity not compliant with the executive orders and memoranda.

All aspects of AmeriCorps grants/awards must comply with President Trump's executive orders, including, but not limited to:

- Grant applications for AmeriCorps resources
- Activities performed by AmeriCorps members/volunteers
- Training provided to members/volunteers



- Program materials, such as volunteer/member applications, enrollment forms, service opportunity listings, and handbooks
- Social media and website posts about your AmeriCorps award

Grantees/sponsors must also ensure all sub applicants/volunteer stations/operating sites/host sites are compliant with executive orders through their memorandum of understanding and subsite monitoring.

### **Which Executive Orders must I comply with?**

AmeriCorps Grantee/Sponsors awards must comply with all executive orders, including but not limited to:

- [Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government - The White House](#)

#### **Per the Trump-Vance Administration:**

- *It is the policy of the United States to recognize two sexes, male and female.*
- *“Sex” shall refer to an individual’s immutable biological classification as either male or female. “Sex” is not a synonym for and does not include the concept of “gender identity.”*
- *When administering or enforcing sex-based distinctions, every agency and all Federal employees acting in an official capacity on behalf of their agency shall use the term “sex” and not “gender” in all applicable Federal policies and documents.*
- *Federal funds shall not be used to promote gender ideology. Each agency shall assess grant conditions and grantee preferences and ensure grant funds do not promote gender ideology.*
- [Ending Radical And Wasteful Government DEI Programs And Preferencing - The White House](#)

#### **Per the Trump-Vance Administration:**

- *(i) terminate, to the maximum extent allowed by law, all DEI, DEIA, and “environmental justice” offices and positions (including but not limited to “Chief Diversity Officer” positions); all “equity action plans,” “equity” actions, initiatives, or programs, “equity-related” grants or contracts; and all DEI or DEIA performance requirements for employees, contractors, or grantees.*
- [Ending Illegal Discrimination And Restoring Merit-Based Opportunity - The White House](#)

#### **Per the Trump-Vance Administration:**

- (iv) *The head of each agency shall include in every contract or grant award:*
  - (A) *A term requiring the contractual counterparty or grant recipient to agree that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code; and*
  - (B) *A term requiring such counterparty or recipient to certify that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.*

- [Unleashing American Energy - The White House](#)

**Per the Trump-Vance Administration:**

- (b) *All activities, programs, and operations associated with the American Climate Corps, including actions taken by any agency shall be terminated immediately.*

**Are federally recognized Tribes subject to the executive orders?**

Yes, the executive orders generally apply to federally recognized Tribes; however, the unique legal and political relationship that federally recognized Tribes have with the United States may impact how executive orders related to diversity, equity, and inclusion (DEI) apply. Grants serving Tribal members may have been mischaracterized in the application description as promoting DEI. If you are a Tribal grantee or are serving Tribal members and have additional questions, please reach out to: [nativeamericanaffairs@americorps.gov](mailto:nativeamericanaffairs@americorps.gov) and cc your portfolio manager.

