



Date: August 20th, 2024

From: Saga Education  
PO Box 830128  
Philadelphia, PA 19182-0128

Subject: Letter of Verification of AmeriCorps Service

To Whom It May Concern,

Saga Education (EIN #47-2168942) is a tax-exempt non-profit organization as described in Section 501(c)(3) of the Internal Revenue Code. Saga is partly funded by a federal grant from the Corporation for National and Community Service, also known as AmeriCorps.

As a State and National AmeriCorps grantee, Saga Education uses funding from AmeriCorps to support the cost of placing tutors in under-resourced schools to provide daily mentoring and academic development in mathematics during the school day. Tutors are not Saga employees. They are members of the AmeriCorps program. They simply perform their AmeriCorps service with Saga.

AmeriCorps Members receive a living allowance for their service that, per federal guidance, is not to be considered income.

As outlined on page 3, Section D of the AmeriCorps authorizing statutes mandates that the living allowance must not be considered income.

In addition to the materials on page 3, the memorandum from the [General Counsel RE: Impact of AmeriCorps Benefits on Food Stamp Eligibility](#) is attached starting on page 4 for your reference. This document also discusses that the living allowance for members is separate from SNAP benefit calculations.



Saga Education requests your due diligence and attention to the legal requirements when processing the AmeriCorps member's benefit for food and other public assistance.

AmeriCorps Member Name	<b>Ryan Scott</b>
First Day of Service	<b>August 5th, 2024</b>
Scheduled Last Day of Service	<b>June 11th, 2025</b>
Organization Name	<b>Saga Innovations, Inc., dba Saga Education</b>
IRS Determination	<b>501(c)(3) charity, non-profit organization</b>
Contact	<b>americorpshelp@saga.org, 860-929-0348</b>

Please contact me for AmeriCorps member verification, questions, or additional information.

With Best Regards,

A handwritten signature in black ink, appearing to read 'SB' or similar initials.

Silvia Baptista  
AmeriCorps Support and Compliance Specialist



under this title such labor market information as is appropriate for use in carrying out the purposes of this title.

(d) **TREATMENT OF BENEFITS.**—Allowances, earnings, and payments to individuals participating in programs that receive assistance under this title shall not be considered to be income for the purposes of determining eligibility for and the amount of income transfer and in-kind aid furnished under any Federal or federally assisted program based on need, other than as provided under the Social Security Act (42 U.S.C. 301 et seq.).

(e) **STANDARDS OF CONDUCT.**—Programs that receive assistance under this title shall establish and stringently enforce standards of conduct at the program site to promote proper moral and disciplinary conditions.

(f) **PARENTAL INVOLVEMENT.**—

(1) **IN GENERAL.**—Programs that receive assistance under the national service laws shall consult with the parents or legal guardians of children in developing and operating programs that include and serve children.

(2) **PARENTAL PERMISSION.**—Programs that receive assistance under the national service laws shall, before transporting minor children, provide the children's parents with the reason for the transportation and obtain the parents' written permission for such transportation, consistent with State law.

**SEC. 178. [42 U.S.C. 12638] STATE COMMISSIONS ON NATIONAL AND COMMUNITY SERVICE.**

(a) **EXISTENCE REQUIRED.**—

(1) **STATE COMMISSION.**—Except as provided in paragraph (2), to be eligible to receive a grant or allotment under subtitle B or C or to receive a distribution of approved national service positions under subtitle C, a State shall maintain a State Commission on National and Community Service that satisfies the requirements of this section.

(2) **ALTERNATIVE ADMINISTRATIVE ENTITY.**—The chief executive officer of a State may apply to the Corporation for approval to use an alternative administrative entity to carry out the duties otherwise entrusted to a State Commission under this Act. The chief executive officer shall ensure that any alternative administrative entity used in lieu of a State Commission provides for the individuals described in paragraph (1), and some of the individuals described in paragraph (2), of subsection (c) to play a significant policymaking role in carrying out the duties otherwise entrusted to a State Commission, including the submission of applications on behalf of the State under section 130.

(b) **APPOINTMENT AND SIZE.**—Except as provided in subsection (c)(3), the members of a State Commission for a State shall be appointed by the chief executive officer of the State. A State Commission shall consist of not fewer than 15, and not more than 25, voting members, and any ex officio nonvoting members, as described in paragraph (3) or (4) of subsection (c).

(c) **COMPOSITION AND MEMBERSHIP.**—

(1) **REQUIRED MEMBERS.**—The State Commission for a State shall include as voting members at least one of each of the following individuals:

May 19, 2009





TO: All Corporation-supported grantees and sponsoring organizations

FROM: Frank R. Trinity  
General Counsel

DATE: May 24, 2007

RE: Impact of AmeriCorps Benefits on Food Stamp Eligibility

This memorandum is intended to clarify how benefits received under AmeriCorps\*State and National and AmeriCorps\*VISTA (VISTA) are treated for food stamp purposes. The treatment of benefits varies depending upon whether the member in question is serving with AmeriCorps\*State and National or VISTA. The Corporation for National and Community Service is the Federal agency responsible for overseeing both the AmeriCorps\*State and National and VISTA programs. However, the programs were authorized and are governed by different legislation which provides for different treatment of benefits.

#### Impact of AmeriCorps\*State and National Benefits on Food Stamp Eligibility

The AmeriCorps\*State and National program was authorized by the National and Community Service Act of 1990 (NCSA), 42 U.S.C. § 12501 *et seq.* The NCSA states that allowances, earnings, and payments to participants in AmeriCorps programs “shall not be considered income for the purposes of determining eligibility for and the amount of income transfer and in-kind aid furnished under any Federal or federally-assisted program based on need, other than as provided in the Social Security Act.” 42 U.S.C. § 12637(d). Based on this language, the USDA issued an opinion in 2001 stating that AmeriCorps\*State and National benefits are excluded from income for food stamp purposes. (See attached).

#### Impact of AmeriCorps\*VISTA Benefits on Food Stamp Eligibility

There are different rules for AmeriCorps\*State and National and VISTA members. The statutory requirements for the VISTA program are located in Title I, Part A, of the Domestic Volunteer Service Act of 1973 (DVSA), 42 U.S.C. §§ 4951-4960. In addition to Part A requirements, various provisions of Title IV of the DVSA apply to VISTA sponsoring organizations and VISTA members, 42 U.S.C. §§ 5043 – 5065. Section 404 of the DVSA states, in relevant part, as follows:

(f)(1) Notwithstanding any other provision of law except as may be provided expressly in limitation of this subsection, payments to volunteers under this chapter shall not in any way reduce or eliminate the level of, or eligibility for, assistance or services any such volunteers may be receiving under any governmental program, except that this paragraph shall not apply in the case of such payments when the Director determines that the value of all such payments, adjusted to reflect the number of hours such volunteers are serving, is equivalent to or greater than the minimum wage then in effect under the Fair Labor Standards Act... or the minimum wage under the laws of the State where such volunteers are serving, whichever is greater.



(f)(2) Notwithstanding any other provision of law, a person enrolled for full-time service as a volunteer under Title I of this Act who was otherwise entitled to receive assistance or services under any governmental program prior to such volunteer's enrollment shall not be denied such assistance or services because of such volunteer's failure or refusal to register for, seek, or accept employment or training during the period of such service.

42 U.S.C. § 5044(f)(1) and (2). (Emphasis added).

In other words, if a VISTA member was receiving food stamps prior to enrolling in the VISTA program, payments to that VISTA cannot be considered in determining the amount of or eligibility for food stamps. Furthermore, entitlements to assistance may not be denied because of a participant's failure or refusal to seek or accept employment while serving with the VISTA program. However, if a VISTA member was not receiving food stamps before entering the VISTA program, the member's VISTA payments may be included as income in making food stamp calculations. This information can also be found in the USDA's implementing regulations at 7 CFR 273.9(c)(10)(iii).

#### Summary

Although AmeriCorps\*State and National and VISTA members may serve in the same community, and sometimes, with the same non-profit organization, they serve under different rules. The chart below demonstrates how a member's benefits should be treated based on the program with which the member serves.

If the member is serving with....	And the member...	Then...
AmeriCorps*State and National (NCSA)	... was receiving food stamps prior to beginning service	...the member's eligibility should be unaffected by their AmeriCorps living allowance.
	... was NOT receiving food stamps prior to beginning service	
AmeriCorps*VISTA (DVSA)	... was receiving food stamps prior to beginning service	...the member's living allowance may be included in income for food stamp purposes.
	... was NOT receiving food stamps prior to beginning service	

Bottom line: The only situation in which an individual's food stamp eligibility might be affected is when the individual enrolls as a VISTA member and subsequently applies for food stamps.

Attachment: 2001 USDA Ruling on AmeriCorps\*State and National Eligibility for food stamps



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

3101 Park  
Center Drive

Alexandria, VA  
22302-1500

Frank R. Trinity  
Acting General Counsel  
Corporation for National Service  
1201 New York Avenue, NW  
Washington, DC 20525

Dear Mr. Trinity:

Thank you for your letter of March 28, 2001. You asked that we give you updated guidance on the question of whether AmeriCorps benefits are excluded from income for food stamp purposes. You pointed out that the National and Community Service Act of 1990, as amended in 1999, (NCSA) no longer refers to the Job Training Partnership Act (JTPA).

AmeriCorps payments continue to be excluded from income for food stamp purposes. The NCSA states that allowances, earnings, and payments to participants in AmeriCorps programs must not be considered income for the purpose of determining eligibility for, and the amount of income transfer and in-kind aid given under, any Federal or federally-assisted program based on need, other than as provided under the Social Security Act.

Although the linkage with JTPA did not affect the counting of AmeriCorps benefits for food stamp purposes in the past, the linkage caused some confusion at times. JTPA income was only counted if it was from on-the-job training (OJT), and AmeriCorps programs did not have any OJT payments. However, in some instances, State food stamp agencies thought that they were dealing with OJT payments in AmeriCorps programs. The change in the NCSA should eliminate this confusion. We are amending our guidance to State agencies to alert them to the change in the NCSA.

Please let us know if you would like further information on this matter. (Incidentally, Judy Seymour has retired.)

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Waldron'.

Patrick Waldron  
Branch Chief  
Certification Policy Branch

AN EQUAL OPPORTUNITY EMPLOYER