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August 14, 2016

Adam Meier
Deputy Chief of Staff
Office of the Governor, Matthew G. Bevin
The State Capitol
700 Capitol Avenue
Frankfort, KY 40601

Dear Mr. Meier:

Thank you for your invitation to visit in June about the community engagement provision of the Kentucky HEALTH demonstration waiver. It was a pleasure to meet you, learn more about the proposal and share more with you about Kentucky's nonprofit sector.

Volunteerism is one of the unifying experiences of our society. The desire to make a difference by helping our neighbors without expecting anything in return is not just an American impulse, but an essential element of humanity. Volunteering is, and should be, about doing good. The nonprofit sector is proud of and grateful to the millions of Americans who step forward and serve their local communities through volunteerism with nonprofit organizations.

As I shared with you during our meeting, supervising, training and managing volunteers requires nonprofit resources of staff, time, funding and expertise. Kentucky Nonprofit Network is among the state and national entities that exist to provide nonprofit staff members with the training and education they need to successfully manage a volunteer program and effectively manage risk.

While many nonprofit organizations would not be impacted by this proposal because they simply do not utilize volunteers to accomplish their mission, we have heard from a number of organizations who regularly utilize volunteers and feel it's important that the sector share its unified concerns regarding the burden and costs of this proposal. Here is a representative sample of the comments we've received:

- *Volunteers are a critical part of any nonprofit's mission. Volunteers ensure your work gets done efficiently and allows donors, friends and interested parties to further their engagement beyond a cash investment (time and talent in addition to treasure). But any nonprofit will tell you, it takes professionals to effectively manage volunteers. For the experience to be valuable for both the agency and the individual, volunteer efforts have to be managed. Is it worth the limited and*

precious resources of a nonprofit to manage a volunteer that is there because "they have to be" not because they want to be? Nonprofit employees are spread so thin as it is and I feel like a volunteer requirement for anyone not truly committed to the mission of the agency isn't an effective use of anyone's time.

- Volunteers are indeed critical. However, volunteers aren't "free". There is time and training required to make it a good experience for both the individual and the organization. It seems a good idea in theory and I do foresee some positives but unfortunately it sounds like it may put a bigger strain that it's worth on nonprofits, particularly smaller nonprofits and/or those that require special skills.
- With SNAP in our county already having a volunteer requirement if not working, this addition will compound on social service agencies and the recipient.
- We require background checks and medical/drug screens, and cover all costs, so that wouldn't be an issue for us (though not true for all nonprofits). However, I do not typically take people who are "required" to volunteer, because they don't make good volunteers. Also, 20 hours is A LOT OF TIME. We don't allow people to volunteer that many hours because at that point they could be considered a part time employee, and you have potential legal issues to consider. Almost all of our positions are 2-4 hours a week, with most volunteers having no more than 10 hours/week. I'm sure there are a lot of organizations that wouldn't have that many positions to go around anyway, depending on the volume of people requesting to volunteer. It seems like this requirement could cause an undue hardship on many nonprofits. And then what happens to those who are continually told "NO"? Will it be their fault if they cannot find anywhere to volunteer (through no fault of their own), and in turn affect their benefits??
- The bottom line is this will cost nonprofits money – money and resources we don't have to spare. It's an undue burden. Plus, there are small towns with few nonprofits to create these opportunities.
- We work with children (and other nonprofits also work with vulnerable populations) and because of this, we use a limited number of volunteers. Those we use undergo comprehensive (and expensive) background checks. Training, supervising and managing the few volunteers we utilize is a time consuming and ongoing process.
- We are one of the few nonprofits in our rural, poor community and I can just imagine the amount of calls we will get from folks seeking volunteer hours. We utilize volunteers, but we don't have the capacity to manage the influx we would receive.
- I am guessing there is paperwork and other reporting that is required. In addition to the cost of background checks, the resources required to run the volunteer program and now the time to help these folks prove they've "done their time" – it's not the best use of our limited resources. Will we now be involved in disputes and appeals from individuals and government contending that someone didn't meet their minimum time required?
- Funding is down and demand for our services is up – some of our former donors and volunteers are now recipients of our programs. While this proposal would be seen by some as a "fix" for this problem, it's not a fix at all. We are not eager for more unpaid assistance from folks volunteering only because they are trying to earn enough credits for a root canal.
- Our organization has been serving our community in rural Kentucky for over 20 years. Some of our best volunteers have been recipients of public assistance – that's not the issue. The issue is, we are too busy to be trying to motivate and oversee forced volunteers.
- Running a good volunteer program (good for the nonprofit and the volunteer, which ultimately benefits those served) requires lots of training, supervision and support of volunteers. In our experience, "coerced" volunteers don't result in a good volunteer program.

- *How do the working poor, who often work multiple low-paying jobs, have time to volunteer? It sounds like recipients will need maximum flexibility so they can leave for job interviews and other obligations.*
- *We love volunteers with a desire to give back. But we don't have the capacity at our small organization to work with volunteers who are simply here to check off hours rather than truly serving from the heart.*
- *The assumption that "anyone" can do any "nonprofit work" is both uninformed and offensive. If these programs will provide real value, I suggest these individuals be given the opportunity to earn their credits by working for the state – fielding phone calls from the general public, responding to constituent letters and emails, analyzing public policy proposals, conducting fiscal analysis, responding to emergencies, or working on security details.*

Kentucky Nonprofit Network supports programs that promote volunteering activities that mutually benefit the individuals volunteering and the people and communities served by nonprofit organizations. Thank you for the opportunity to share these concerns of some of our members across Kentucky. Please feel free to contact me with any questions or opportunities for continued discussion.

Sincerely,

Danielle Clore
Executive Director/CEO

cc: Secretary Vickie Yates Brown Glisson
Commissioner Stephen Miller