

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND (BALTIMORE)

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE OF
ARIZONA; STATE OF CONNECTICUT;
DISTRICT OF COLUMBIA; STATE OF
HAWAII; STATE OF ILLINOIS; OFFICE OF
THE GOVERNOR *ex rel.* Andy Beshear, in his
official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE
OF MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE
OF MICHIGAN; STATE OF MINNESOTA;
STATE OF NEVADA; STATE OF NEW
JERSEY; STATE OF NEW MEXICO; STATE
OF NEW YORK; STATE OF NORTH
CAROLINA; STATE OF OREGON; JOSH
SHAPIRO, in his official capacity as Governor of
the COMMONWEALTH OF PENNSYLVANIA;
STATE OF RHODE ISLAND; STATE OF
VERMONT; STATE OF WASHINGTON;
STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE operating as
AMERICORPS; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

**BRIEF OF THIRTY-THREE BIPARTISAN FORMER GOVERNORS AS *AMICI*
CURIAE IN SUPPORT OF PLAINTIFFS' MOTION FOR A PRELIMINARY
INJUNCTION**

INTERESTS OF *AMICI CURIAE*

Amici curiae are a bipartisan group of former governors of various states who have directly witnessed and overseen the substantial benefits that AmeriCorps programs bring to their respective states. During their tenures, *amici* and their administrations collaborated extensively with AmeriCorps programs to address critical state needs, strengthen local communities, and provide valuable civic engagement opportunities for residents. As governors, *amici* had the responsibility to provide the best possible services, resources, and aid to every person in their states and to safeguard their residents' health, safety, and well-being. Each of the undersigned *amici* was proud to partner with AmeriCorps to help fulfill that mission.

The undersigned former governors represent diverse political affiliations, geographies, and tenures, yet are unified in their support for the continuation of AmeriCorps programs based on their firsthand experience with the program's tangible benefits to states, local communities, and individuals. The former governor *amici* in support of this brief are:

Kate Brown, former Governor of Oregon (2015-2023)

Steve Bullock, former Governor of Montana (2013-2021)

Arne Carlson, former Governor of Minnesota (1991-1999)

Roy Cooper, former Governor of North Carolina (2017-2025)

Gray Davis, former Governor of California (1999-2003)

Mark Dayton, former Governor of Minnesota (2011-2019)

Jim Doyle, former Governor of Wisconsin (2003-2011)

Parris N. Glendening, former Governor of Maryland (1995-2003)

Jennifer M. Granholm, former Governor of Michigan (2003-2011)

John Hickenlooper, former Governor of Colorado (2011-2019)

Jay Inslee, former Governor of Washington (2013-2025)

Tim Kaine, former Governor of Virginia (2006-2010)

Angus King, former Governor of Maine (1995-2003)

John A. Kitzhaber, former Governor of Oregon (1995-2003; 2011-2015)

Tony Knowles, former Governor of Alaska (1994-2002)
Gary Locke, former Governor of Washington (1997-2005)
Joe Manchin, former Governor of West Virginia (2005-2010)
Jack Markell, former Governor of Delaware (2009-2017)
Terry McAuliffe, former Governor of Virginia (2014-2018)
Martin O'Malley, former Governor of Maryland (2007-2015)
Deval Patrick, former Governor of Massachusetts (2007-2015)
Paul E. Patton, former Governor of Kentucky (1995-2003)
Marc Racicot, former Governor of Montana (1993-2001)
Gina Raimondo, former Governor of Rhode Island (2015-2021)
Edward G. Rendell, former Governor of Pennsylvania (2003-2011)
Kathleen Sebelius, former Governor of Kansas (2003-2009)
Jeanne Shaheen, former Governor of New Hampshire (1997-2003)
Steve Sisolak, former Governor of Nevada (2019-2023)
Eliot Spitzer, former Governor of New York (2007-2008)
Bill Walker, former Governor of Alaska (2014-2018)
Bill Weld, former Governor of Massachusetts (1991-1997)
Christine Todd Whitman, former Governor of New Jersey (1994-2001)
Tom Wolf, former Governor of Pennsylvania (2015-2023)

ARGUMENT

I. AmeriCorps Provides Critical Services To Our States.

Amici collectively have decades of experience with AmeriCorps programs, which provide invaluable social services to communities nationwide, tangibly improving their lives on a daily basis. For over thirty years, AmeriCorps has placed nearly 200,000 volunteers with community organizations across the country and awarded more than 3,100 projects and grants per year—from education and disaster relief to helping combat the opioid epidemic.¹ *Amici* can attest that gutting AmeriCorps would devastate states' abilities to provide vital services to its residents.

¹ *What We Do*, AmeriCorps, <https://www.americorps.gov/about/what-we-do> (last visited May 9, 2025).

A. Without AmeriCorps, State Governors Will Be Unable to Provide Critical Social Services.

AmeriCorps exemplifies what it means to be an American and to care for our country and its people. *Amici* have particular experience with AmeriCorps “State and National” offerings, which operate through state institutions—known as State Service Commissions—to provide services to local communities. State Service Commissions, created in the National and Community Service Trust Act in 1993, heralded an era of bipartisan support for community service and dedication to fostering civic engagement across the nation. Here, governor-led boards work closely with AmeriCorps to administer AmeriCorps grants. For FY 2024, Congress allocated \$557,094,000 to State and National Grants.² As former governors who worked closely with our respective State Service Commissions, *amici* are proud of that legacy.

Through the State Service Commission partnership, AmeriCorps invests heavily in our states, providing significant volunteer and employment power as well as monetary investment to create and expand needed programs. For example, in North Carolina, AmeriCorps deployed over 3,300 volunteers across 700 service sites and invested a total of \$35.4 million into local organizations last year.³ In Minnesota the investment was even higher, deploying 15,481 volunteers and members across 2,304 service locations and dedicating a total of \$82.7 million to state programs.⁴

Attacks on AmeriCorps and its volunteers threaten critical state programs upon which our residents rely. From conservation, to education, to public health, AmeriCorps’ support is

² 170 Cong. Rec. H2060-61 (daily ed. Mar. 22, 2024); *see also* *State Service Commissions*, Am.’s Serv. Comm’ns, <https://www.statecommissions.org/state-service-commissions> (last visited May 9, 2025).

³ *National Service in North Carolina*, AmeriCorps, <https://americorps.gov/national-service-report/nc> (last visited May 9, 2025).

⁴ *National Service in Minnesota: 2023 Year in Review*, AmeriCorps (2024), https://americorps.gov/sites/default/files/upload/state_profiles/pdf_2024/MN_Combined.pdf.

interwoven into the very foundation of the way our states provide services. In this way, eliminating AmeriCorps would effectively debilitate state programs that have, for years, operated for the benefit of all residents.

Conservation. One of the areas where our states will feel the loss of AmeriCorps most acutely is in environmental conservation. Our states rely on AmeriCorps members and resources to preserve vulnerable state lands, maintain hiking trails, combat invasive species, and teach the next generation how to be responsible stewards of the environment. Without these resources, we know that many of our states' most important conservation projects will suffer.

For example, the Wisconsin Conservation Corps ("WisCorps") founded in 2009, partners with land management agencies throughout the state to match individuals with hands-on service opportunities in environmental stewardship.⁵ WisCorps hosts nearly 100 AmeriCorps members annually for this crucial work on projects like maintaining the Wisconsin Ice Age Trail, caring for the Lake Superior shoreline, and operating environmentally focused educational opportunities and summer camps for Wisconsin's youth.⁶ Since first partnering with AmeriCorps in 2018, WisCorps has tackled many of the state's most sensitive conservation projects, helping preserve the natural treasures that Wisconsinites have enjoyed for generations.

That partnership is now at risk. Since the abrupt decision to gut the AmeriCorps program, dozens of active WisCorps members will likely have to stop work, and dozens more—mere weeks away from starting their summer conservation assignments—will have to abandon those plans.⁷ Additionally, without the support of AmeriCorps members, critical conservation projects and

⁵ Madeline Heim, *Trump's Dismantling of AmeriCorps Puts Wisconsin Environmental Service Program at Risk*, Milwaukee J. Sentinel (update May 3, 2025) <https://www.jsonline.com/story/news/2025/05/02/wiscorps-conservation-program-in-jeopardy-as-trump-slashes-ameri-corps/83374504007/>.

⁶ *Id.*

⁷ *Id.*

programs administered by WisCorps will likely go unfinished. These include programs like planting trees near Lake Superior, improving bike trails in the Wisconsin North Woods, and conducting youth programs throughout the state.⁸

In total, WisCorps leadership anticipates that approximately 35 projects across the state will either never begin, or will go unfinished, because of the proposed cuts to AmeriCorps.⁹ These are projects and programs upon which Wisconsin residents have grown to depend and that represent a downpayment on the state's future that, it appears, will go unpaid.

Education. State educational programs will also suffer because of these cuts. Across the country, AmeriCorps and its members support state educational efforts that serve some of the most disadvantaged students in many of the hardest to reach locations. Over 55,000 AmeriCorps volunteers and members serve in 10,000 schools nationwide, impacting over 900,000 children in grades K-12 and improving student outcomes.¹⁰ Without these resources, whole cohorts of students who rely on their AmeriCorps partners will fall further behind, and the communities they call home will be forced to do more with less.

Consider the example of Framingham, Massachusetts. Although the Boston suburb is majority-English speaking, its public schools have struggled to serve a rapidly growing population of students for whom Portuguese or Spanish is their native language.¹¹ To address this challenge, in 2021, the Framingham Public Schools partnered with Framingham State University to launch

⁸ *Id.*

⁹ *Id.*

¹⁰ AmeriCorps, *What We Do: Education* at 1, <https://p1.aprimocdn.net/ameriCorps/d51f77e2-bdad-411a-a9ec-b29e012018e4/2025-fact-sheet-education-original-file.pdf> (last visited May 9, 2025).

¹¹ See Jessie Collins, *Framingham Educators Visited Brazil to Better Teach Immigrant Students. What They Learned*, MetroWest Daily News (updated Sept. 6, 2023) <https://www.metrowestdailynews.com/story/news/local/2023/09/06/framingham-ma-educators-study-brazilian-educaton-system/70681182007/> (describing the school district's efforts to meet the needs of their growing Brazilian population).

the Framingham Teacher Residency (“FTR”) program. This initiative—supported by AmeriCorps—has staffed 10 to 20 bilingual teaching residents in some of Framingham’s public schools with the highest concentrations of students for whom English is a second language.¹² For one year, these residents learn under licensed public-school teachers in the district. And, in exchange for training, loan forgiveness, and their own teaching licenses, they agree to teach in Framingham Public Schools for three additional years—providing critical support to a school district adapting to meet the needs of its changing community.

FTR was meant to serve as a model for other Massachusetts public school districts struggling to respond to teacher shortages at a time of unprecedented change for their students and communities. Instead, it may not survive another year. The attacks on AmeriCorps threaten to sever a critical lifeline for this new initiative.¹³ Although this means uncertainty for the teaching residents—and hardship for Framingham Public Schools—it is the students who will suffer most, as they stand to lose a vital support structure.

Public Health. Many of our states still struggle with the opioid epidemic, which at its peak, cost nearly 108,000 Americans their lives, according to the Centers for Disease Control (“CDC”).¹⁴ Public Health AmeriCorps members across the country work to treat the lasting effects of addiction on communities.¹⁵ For example, through the Kentucky Public Health AmeriCorps,

¹² Emily Rosenberg, *FSU, Framingham Launch First Teacher Residency Program*, The Gatepost (Oct. 14, 2022), <https://www.fsugatepost.com/post/fsu-framingham-launch-first-teacher-residency-program>.

¹³ Complaint, Ex. F at ECF p. 14, *Maryland v. Corp. for National and Community Service*, No. 1:25-cv-01363 (D. Md., Apr. 29, 2025), ECF No. 1-6.

¹⁴ *Understanding the Opioid Overdose Epidemic*, CDC (Nov. 1, 2024), <https://www.cdc.gov/overdose-prevention/about/understanding-the-opioid-overdose-epidemic.html>.

¹⁵ AmeriCorps Staff, *National Service Addresses the Nation's Substance Use Disorder Crisis*, AmeriCorps (Sept. 26, 2024), <https://americorps.gov/blogs/2024-09-26/national-service-addresses-nations-substance-use-disorder-crisis#:~:text=We%20work%20with%20organizations%20to,%2C%20prevention%2C%20and%20recovery%20efforts.&text=AmeriCorps%20member%20Julie%20is%20serving,lives%20of%20those%20in%20recovery>.

AmeriCorps members are, among other things, tasked with implementing the state's harm reduction program, which works to reach those who are not otherwise "accessing health care services by providing naloxone, wound care kits and drug testing strips," among other services.¹⁶ As a result of the attacks on AmeriCorps, Kentucky is now at risk of losing that program and its 75 participants,¹⁷ potentially endangering the lives of community members struggling to overcome this deadly addiction.

In Kansas, fifteen AmeriCorps members work with the Unified Government of Wyandotte County through the WYCO Public Health Corps.¹⁸ Through this program, AmeriCorps members work to "improve community health, especially among vulnerable populations," while focusing on areas like tobacco cessation, COVID-19 outreach and education, and the county's Community Health Improvement Plan. In exchange for this critical support, Public Health Corps participants are eligible for educational scholarships to help pay for college, for vocational training, or to pay back student loans. Now, as a result of the cuts, that program will likely end, taking with it much needed support for the most vulnerable members of the Wyandotte County community.¹⁹

B. AmeriCorps Provides Critical National Programs That Supplement State Services Across the Country.

In addition to operating programs through the State Service Commissions, AmeriCorps also offers a collection of national programs designed to provide resources for children, the elderly, and veterans, while strengthening local ties, reinvigorating the workforce, and fostering leadership

¹⁶ See AmeriCorps, *2024-25 Kentucky AmeriCorps Grants: Operational Programs* (updated Mar. 3, 2025), https://serve.ky.gov/ameriCorps/Documents/FY24_KY_AmeriCorps_Grants.pdf; *Harm Reduction Program*, Team Kentucky, <https://www.chfs.ky.gov/agencies/dph/Pages/harmreduction.aspx>.

¹⁷ See *supra* note 13, at ECF p. 7.

¹⁸ Press Release, U.S. Representative Sharice Davids, *Davids Announces Funding to Train 30 Public Health and Service Workers in the Kansas Third District* (May 20, 2022) <https://davids.house.gov/media/press-releases/davids-announces-funding-train-30-public-health-and-service-workers-kansas>.

¹⁹ See *supra* note 13, at ECF p. 17.

and civic engagement. Because AmeriCorps services target our most vulnerable and rural populations, losing these critical resources would put these communities at an even greater disadvantage. Without these valuable partnerships with AmeriCorps, state resources—already a precious commodity—will be stretched even more, and these vulnerable and rural communities will bear the impacts.

On a national scale, AmeriCorps works with all 50 states to offer a wide variety of programming that supplements—but does not duplicate—state resources.²⁰ This means that AmeriCorps, by design, offers services that would otherwise be unavailable—and which *will* be unavailable should AmeriCorps be dismantled.

AmeriCorps National Civilian Community Corps. As governors, we depended on the critical support that AmeriCorps provided when natural disasters struck our states. For example, the AmeriCorps National Civilian Community Corps (“NCCC”) program works in tandem with the Federal Emergency Management Agency (“FEMA”) and state volunteer organizations to support “mission-critical functions” in providing disaster relief services to people affected by life-altering events, by offering survivor assistance and logistical services to help everyday Americans rebuild from devastation.²¹ In the wake of the wildfires in Southern California, for example, AmeriCorps members proved invaluable services to assist recovery efforts and delivered essential supplies to affected communities.²² Until recently, AmeriCorps had hundreds of members on the

²⁰ AmeriCorps, *Introduction to AmeriCorps State and National: A Presentation for AmeriCorps Grant Applicants* at 5-6 (2018), <https://americorps.gov/sites/default/files/documents/1%20-%20Intro%20to%20AmeriCorps%20State%20and%20National%202018.pdf>.

²¹ *AmeriCorps NCCC FEMA Corps*, AmeriCorps, <https://americorps.gov/serve/americorps/americorps-nccc/fema-corps> (last visited May 9, 2025).

²² Chloe Oliveras, Guest Opinion, AmeriCorps Members Stepped Up for Southern California —It’s Time to Do the Same for Them, *Pasadena Now* (May 5, 2025), <https://pasadenanow.com/main/guest-opinion-chloe-oliveras-americorps-members-stepped-up-for-southern-california-its-time-to-do-the-same-for-them>.

ground still aiding in that recovery.²³ When tragedy strikes, state resources are pushed to their limits, and as governors, we relied on AmeriCorps support to ensure that adequate resources were deployed.

Critically, AmeriCorps volunteers and programs also help prepare communities *before* disaster strikes. The AmeriCorps NCCC Forest Corps trains members to deploy where they are needed to mitigate the possibility of wildfires, manage smaller fires, and make forests and communities more resilient.²⁴ As wildfire season continues to increase in duration, burned area, and frequency,²⁵ these services are crucial to not only provide affected individuals the resources they need to rebuild their lives, but also prevent such a tragedy from striking in the first instance.

In another recent example, AmeriCorps members deployed to Florida, North Carolina, Georgia, Tennessee, and Texas to aid in recovery due to Hurricanes Helene and Milton, removing debris, connecting survivors to emergency supplies, coordinating donations, and providing shelter support.²⁶ These services have become even more critical due to cuts to FEMA's funding.²⁷

AmeriCorps VISTA. As former governors, combatting the crisis of poverty in our rural and urban communities is one of the most important, and challenging, issues we faced. The AmeriCorps Volunteers in Service to America ("VISTA") program has, for decades, been an

²³ *Active Disaster Response*, AmeriCorps, https://www.americorps.gov/about/what-we-do/active-disaster-response?_gl=1*b9l7jb*_gcl_au*MTEzODA4MzQxNi4xNzM2MjAzNTQx (last visited May 9, 2025).

²⁴ *AmeriCorps NCCC FEMA Corps*, *supra* note 21.

²⁵ *Climate Change Indicators: Wildfires*, EPA, <https://www.epa.gov/climate-indicators/climate-change-indicators-wildfires> (last updated Feb. 4, 2025) ("Multiple studies have found that climate change has already led to an increase in wildfire season length, wildfire frequency, and burned area.").

²⁶ Press Release, Voices for Nat'l Serv., AmeriCorps Ramps Up Disaster Response in North Carolina and Florida Following Hurricanes Helene and Milton (Oct. 22, 2024), <https://voicesforservice.org/news/ameri-corps-ramps-up-disaster-response-in-north-carolina-and-florida-following-hurricanes-helene-and-milton/>; *Active Disaster Response*, AmeriCorps, https://www.americorps.gov/about/what-we-do/active-disaster-response?_gl=1*b9l7jb*_gcl_au*MTEzODA4MzQxNi4xNzM2MjAzNTQx (last visited May 9, 2025).

²⁷ Nat. Resources Defense Council Editorial Board Memo, *Trump's Cuts to FEMA Leave Us Unprepared for Disasters* (Feb. 24, 2025), <https://www.nrdc.org/media/trumps-cuts-fema-leave-us-unprepared-disasters>.

integral partner in that fight. Founded in 1965, VISTA is “an anti-poverty program designed to provide needed resources” directly to nonprofit organizations and public agencies to “increase their capacity to lift communities out of poverty.”²⁸ This national program places young public servants in organizations across the country to work in areas as varied as education, public health, access to benefits, and more. Though our VISTA members may not be originally from our states, they nonetheless integrate themselves into some of our most impoverished communities to lift up those most in need of a helping hand.

Due to the current attack on AmeriCorps, VISTA stands to lose over \$9 million nationally and over 2,000 participants.²⁹ This loss is devastating. VISTA members support our nonprofit institutions, staff our poverty fighting agencies, and work with our schools and universities to ensure our students have the resources they need to succeed.

The human element of this loss is impossible to ignore. For example, in Massachusetts, several VISTA members serve at a small nonprofit in Provincetown called Helping Our Women (“HOW”), which assists low-income women with chronic health conditions through financial support, transportation, benefits assistance, food access, medical advocacy, and more.³⁰ HOW was founded out of the realization that, in rural areas as remote as the towns on the Outer Cape, living with a chronic condition like breast cancer, Parkinson’s disease, or multiple sclerosis was too hard to do alone. Each year, HOW relies on VISTA members for critical roles that would otherwise be impossible to fill in such a small community. It now appears that HOW will lose that support, and the women they serve will lose life-saving advocates during their time of need.

²⁸ *AmeriCorps VISTA*, AmeriCorps, <https://americorps.gov/partner/how-it-works/americorps-vista> (last visited May 9, 2025).

²⁹ Compl., Ex. F, *supra* note 13.

³⁰ *Who We Are*, HOW, <https://helpingourwomen.org/> (last visited May 9, 2025).

AmeriCorps Seniors. AmeriCorps also works in our states through its AmeriCorps Seniors programming, which specifically recruits volunteers over the age of 55. This program has proven to decrease depression, loneliness, and anxiety in participants by providing a sense of community and purpose, leading to improvements in health and general welfare.³¹ These members operate three distinct programs: the Seniors Foster Grandparent program partners with organizations that provide one-on-one educational and tutoring services to children with special needs or disabilities; the Senior Companion program partners with organizations that provide individualized in-home care for homebound adults to preserve their independence; and the Seniors RSVP program partners with organizations that deploy seniors to aid in youth programs, disaster relief, and supporting veterans.³²

These services provide vital assistance to thousands of people in each state. For example, in Kansas, in a single year, the Foster Grandparents program served more than 2,360 children with special needs and the Companion Program supported more than 240 seniors living independently.³³ In Montana, these community members provided tutoring to over 2,100 children with special needs and allowed 310 seniors to live independently with dignity.³⁴ Without this AmeriCorps programming, our social services and nonprofits would be unable to reach many of these recipients, leaving them vulnerable to abuse.³⁵

³¹ See *Make Giving Back Your Second Act*, AmeriCorps, <https://americorps.gov/serve/americorps-seniors> (last visited May 9, 2025).

³² *Id.*

³³ *National Service in Kansas*, AmeriCorps, <https://americorps.gov/national-service-report/ks> (last visited May 9, 2025).

³⁴ *National Service in Montana*, AmeriCorps, <https://www.americorps.gov/national-service-report/mt> (last visited May 9, 2025).

³⁵ See Jerome M. Adams & Lance Robertson, *Elder Abuse: A Public Health Issue That Affects All of Us*, Admin. for Community Living (June 15, 2018), <https://acl.gov/news-and-events/acl-blog/elder-abuse-public-health-issue-affects-all-us-0>; see also Fran Kritz, *A Report on Violence Against Kids With Disabilities Is Sobering—If Not Surprising*,

These represent just a few of the myriad programs that AmeriCorps operates nationwide to provide support to state infrastructure and fill gaps in critical resource access—benefitting not only discrete organizations and local governments, but also hard-working Americans in our states.

II. Dismantling AmeriCorps Will Result In Diminished Civic Engagement.

As former governors who place great value on the importance of public service and civic engagement, *amici* have also witnessed the myriad ways in which AmeriCorps provides structured opportunities for meaningful public service and civic engagement across our states and within our communities. AmeriCorps members and volunteers serve at nonprofit, faith-based, municipal, and community-based organizations to address the nation’s most pressing issues.³⁶

Eliminating AmeriCorps dismantles a proven catalyst for broader civic engagement within our states. In the last year, approximately 200,000 Americans participated in AmeriCorps programs in over 40,000 locations across the country, with many more engaged as community volunteers through AmeriCorps-lead initiatives.³⁷ Research demonstrates that AmeriCorps volunteers are more likely to vote, volunteer, and be more prepared for the job market than their peers.³⁸ Not to mention that AmeriCorps provides important financial benefits for young people seeking careers in public service. Dismantling AmeriCorps would have both far-reaching and long-term implications for the civic health of our states and the futures of our youngest citizens.

NPR (Apr. 12, 2022), <https://www.npr.org/sections/goatsandsoda/2022/04/12/1091679303/a-report-on-violence-against-kids-with-disabilities-is-sobering-if-not-surprisin>.

³⁶ Press Release, AmeriCorps, *Newly Released from AmeriCorps: 2025 National Service Reports*, (Mar. 13, 2025), <https://americorps.gov/newsroom/press-release/ameri-corps-publishes-2025-national-service-reports>.

³⁷ *Id.*; AmeriCorps, *Bring Out the Best of America*, https://americorps.gov/sites/default/files/document/2020_AmeriCorps_Agency_FactSheet_508.pdf (last visited May 9, 2025).

³⁸ *Volunteering and Civic Life in America*, AmeriCorps, <https://www.americorps.gov/about/our-impact/volunteering-civic-life> (last visited May 9, 2025).

AmeriCorps serves as an effective leadership development program, particularly for young adults. Many current public servants, nonprofit leaders, and community organizers across our states began their careers as AmeriCorps members, where they developed both practical skills and a commitment to addressing community challenges. A 2015 AmeriCorps alumni career report indicated that 56% of AmeriCorps alumni currently work in the government or nonprofit sector.³⁹

The elimination of this leadership pipeline will have negative implications for states' civic infrastructures and public service workforces for several reasons.

First, AmeriCorps empowers young people, providing them with the tools needed to succeed and become leaders within their communities. AmeriCorps alumni report that through service, they felt that they made a difference in their communities.⁴⁰ Another survey of Reading Partners AmeriCorps alumni demonstrated that participants felt that their service experience helped them crystallize their professional goals and careers, with over half of study participants noting that AmeriCorps helped them decide on their educational futures.⁴¹ “About two-thirds of Reading Partners AmeriCorps alumni (66[%]) reported that they plan to pursue more education in the future and, of those, 62[%] credited their Reading Partners service experience as influencing those plans.”⁴² Moreover, “Reading Partners AmeriCorps alumni (85[%]) reported that their service experience prepared them for their current job and/or service activity somewhat or a great

³⁹ AmeriCorps, *AmeriCorps Alumni Outcomes: Summary Report Executive Summary* at 3 (Oct. 2015), https://www.americorps.gov/sites/default/files/evidenceexchange/FR_CNCS_Alumni%20Outcomes%20Survey%20Executive%20Summary_1.pdf.

⁴⁰ *Id.*

⁴¹ Leslie M. Anderson et al., *Reading Partners AmeriCorps Alumni Study*, Pol’y Studs. Assocs. at 9-11 (Dec. 2019), https://americorps.gov/sites/default/files/evidenceexchange/ReadingPartners.20ND220475.Report1_508_1.pdf.

⁴² *Id.* at 5.

deal.”⁴³ Through their participation in the program, AmeriCorps alumni gain not only marketable skills, but also gain empowerment over their own lives.

Second, AmeriCorps provides critical financial benefits to young people seeking educational opportunities and careers in public service. AmeriCorps alumni are more likely to attain a bachelor’s degree or higher than the average American adult.⁴⁴ Members are eligible to receive the Segal AmeriCorps Education Award after successfully completing their AmeriCorps term of service. This award can be used to repay qualified student loans and to pay current educational expenses at eligible institutions of higher education and training programs. Further, AmeriCorps members who served in 2007 or later are eligible to apply for the Public Student Loan Forgiveness Program (“PSLF”) issued by the U.S. Department of Education.⁴⁵ The program forgives any outstanding balance and accrued interest on a borrower’s direct loan or direct consolidation loan after ten years of full-time employment at a nonprofit or government agency. The AmeriCorps service year counts toward those ten years if borrowers make payments to their loans during service. These benefits help ensure that AmeriCorps members are both more likely to be able to afford college, and to remain in public service careers once they have graduated.

Third, AmeriCorps provides its members with access to a network of AmeriCorps alumni and job opportunities tailored to individuals interested in the public service sector. There are over 800 “Employers of National Service”—*i.e.*, employers who commit to actively considering and hiring individuals who have completed their term of national service through organizations like

⁴³ *Id.*

⁴⁴ *See supra* note 39.

⁴⁵ *Our Frequently Asked Questions*, AmeriCorps, <https://americorps.gov/members-volunteers/faqs> (last visited May 9, 2025).

AmeriCorps.⁴⁶ Further, AmeriCorps alumni join a network made up of over 1.1 million participants, which provides crucial opportunities for professional advancement.⁴⁷

As former governors who place great value on public service and who have seen its benefits to our communities, we cannot overstate the importance of AmeriCorps for instilling these values in generations of our citizens. AmeriCorps represents the best of America and allowing it to be dismantled would send the wrong message about the significance of public service and civic engagement at a time when these values are most needed. We urge this Court to grant Plaintiffs' motions for a preliminary injunction and prevent AmeriCorps from being destroyed through mass firings and funding cuts. Eliminating AmeriCorps will cause irreparable harm to state services and communities across the country.

CONCLUSION

For the foregoing reasons, *amici* respectfully urge this Court to grant Plaintiffs' motion for a preliminary injunction.

Respectfully submitted, this 9th day of May, 2025.

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⁴⁶ *Employers of National Service*, AmeriCorps, <https://americorps.gov/partner/partnerships/employers-national-service> (last visited May 9, 2025).

⁴⁷ *See Bring Out the Best of America*, *supra* note 37.

CERTIFICATE OF WORD COUNT

Pursuant to Local Rule 102.2 the undersigned counsel hereby certifies that the brief, in support of a motion, which is prepared using a proportionally spaced font, is 15 pages (excluding cover, captions, indexes, tables of authorities, certificates of service, this certificate of word count, and counsel's signature block).

Respectfully submitted, this the 9th day of May, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that, on May 9, 2025, I caused the foregoing to be filed electronically. Notice of this filing will be sent by operation of the Court's Electronic Filing System to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

Respectfully submitted, this the 9th day of May, 2025.

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