

<b>Public Comment: 2010 AmeriCorps State and National Application Instructions</b>						
<b>Document Number</b>	<b>Format</b>	<b>Date</b>	<b>Commenter</b>	<b>Affiliation</b>	<b>Comment</b>	<b>Response</b>
1	Federal Register Publication	10/15/2008				
2	E-mail	11/6/2008	Martin Friedman, Education Works	National Grantee	Make more explicit that it is allowable to include EAPs and stipended members in one application.	Application Instructions will be edited per comment.
					Clarify non-federal sources vs non-Corporation sources of funds.	References to non-federal and non-Corporation will be reviewed and clarified where necessary.

					<p>Under Sec. 130(f) of the National and Community Service Act, if employees of the sponsor are (i) "engaged in the same or substantially similar work: as that proposed to be carried out by AmeriCorps members, and (ii) represented by a labor union, then the service sponsor must obtain a written concurrence from the labor union and submit that concurrence along with its application. This section works along with the prohibitions on duplication of services and displacement of employees to ensure that AmeriCorps members are only used to address unmet needs. A need may be unmet because there is no service currently addressing the need, or because the magnitude of the need is greater than what can be met by the community alone. The concurrence of the relevant union provides an assurance that members will not displace current workers, and is further assurance that they will add value by either addressing a need that is currently not being addressed at the local level, or by expanding upon a service already being provided.</p>
					<p>Clarify why a situation requiring labor union concurrence would not violate anti-duplication</p>

					Make consistent whether it is advisable or required to seek approval from the other federal agency if an applicant is seeking to match other federal funds with Corporation funds.	OGC reviewed language, it will be retained.
					Improve the example of volunteer services contributed to organizations for organizational functions so that they are admin rather than personnel.	Examples have been improved.

					<p>Clarify whether the calculation of living allowance for less-than-full-time members is based on the minimum number of hours.</p>	<p>Programs should require members to serve the minimum number of hours for each education award slot type listed in the chart and pay a corresponding living allowance. However, if for a legitimate program design reason a program requires members to serve hours that do not correspond to the minimum numbers in the chart for the education award, the calculation to determine the <u>maximum</u> amount of living allowance that can be paid can be prorated based on the number of hours served as follows: (Number of hours served ÷ 1700) x \$22,800. Example: (950 ÷ 1700) x \$22,800 = \$12,741. The education award cannot be pro-rated to correspond with the pro-rated living allowance. The amount of the education award is fixed for each slot type, regardless of any additional required hours of service imposed by the program.</p>
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		12/1/2008	Jason Patnosh, NACHC	National Grantee	Page 6, 2nd paragraph under National Professional Corps: remove "living allowance" and insert "salary". For Professional Corps positions the individuals are receiving a salary.	Although Professional Corps members receive a salary, we want to continue to refer to this as a more-than-the-maximum living allowance in order to avoid problems with employment and unemployment laws.
					Page 9, character count not to exceed 71,000. This amount should be increased for national directs as they need to provide snapshots of more geographic locations and the needs of those communities. A suggestion would be to allow brief descriptions of program sites that capture demographics, needs, etc. National directs have to answer for multiple "communities" hence questions asking to describe "target community" are inaccurate in their approach when talking with national directs.	We will not be increasing the character count maximum, and in fact, would prefer more focused and shorter applications. The application instructions request information of multiple site programs.
					"Success in Securing Match Resources"-this is redundant and has already been asked in other sections.	We recognize that success in securing match is requested twice; this is a flaw in the selection criteria as published in our regulations and will be fixed in rulemaking.

					<p>On Contractual, Staff Training and Member Training sections within eGrants, the fields for daily rates should be removed because in some cases there are not daily rates for training. Programs should be required to describe their training within the narrative and include consultant rates if necessary but the fields within eGrants do not necessarily portray an accurate description because programs have to complete in order for the cell to complete.</p>	<p>We will no longer require the daily rate fields to be filled.</p>
					<p>Page 42, Question 12-Areas Affected By Project. This space is very limited and gets cut off when printing.</p>	<p>We will make a technical fix so that Areas Affected by the Project is no longer truncated.</p>
					<p>Page 45, Section IV-Program Focus: There are multiple classifications for children that could be perceived as checking off multiple boxes (i.e., at risk youth could also be children of prisoners, foster children and K-12 students). Also, a low-income community could also be low-income housing residents. We are not sure if an accurate picture of programs is being painted when every box could be checked. Also, for national direct programs nearly every box could be checked to portray the program nationally, but not locally at every site.</p>	<p>We are considering deleting Appendix IV Program Focus, however, these fields are used for paneling peer reviewers, so they will probably be retained.</p>

					<p>Page 48, Performance Measures: Not sure what the value of breaking down the amount of AmeriCorps members participating in an activity, number days per week, number hours per day or when it begins/ends is to the completion of the performance measurement itself. The program is evaluated on the activities being accomplished and not these minute details to get the activities completed.</p>	<p>We are considering simplifying the Performance Measures as you suggest.</p>
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