

Corporation for National and Community Service

AmeriCorps VISTA

VISTA Project Concept Paper and Application

VISTA Project Progress Report Revision

Office of Management and Budget

Clearance Package Supporting Statement for Paperwork Reduction Act Submissions

May 31, 2011

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that require the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The authority for collecting information in the Concept Paper and the Application is contained in 42 U.S.C. 4953 of the Domestic Volunteer Service Act of 1973, as amended.

The information collection consists of a brief Concept Paper, and, if the Concept Paper is approved by the Corporation for National and Community Service, a full application including project budget. This information is used in the approval of both new and renewing VISTA projects.

The Corporation for National & Community Service seeks to revise the previously used Project Application to: (a) better align the information requested on the Concept Paper and the Application; and (b) simplify the project plan while continuing to provide a robust tool for evaluating project performance.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The AmeriCorps*VISTA Project Application and Instructions are used by the Corporation for National & Community Service in the selection of VISTA sponsors and in the approval of both new and renewing VISTA projects.

The data is considered core reporting information to meet a variety of internal needs, including adding new data elements as needed to ensure information collection captures appropriate data for the Corporation's required performance measurement, project evaluation, and other reporting.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technical collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision of adopting that means of collection. Also, describe any consideration of using information technology to reduce the burden.

The Corporation for National & Community Service utilizes a web-based system, eGrants. eGrants is designed to automate the entire grants and project management process from application to closeout. It allows applicants to find funding opportunities, apply for grants or projects, and manage grant reporting online. The system also allows the Corporation to review applications, award grants, and manage those grants and projects efficiently and effectively.

The eGrants system performs the following roles for the Corporation for National and Community Service: submission and tracking grant applications and concept papers; on-line grant application peer review; negotiating and awarding grants and cooperative agreements; managing grants and cooperative agreements including processing amendments, continuations; and financial status and progress reporting. Other means of submission are available for those with technological difficulty or hardship.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

This information will be collected from organizations and agencies that are not associated, or annually renewing an application, with the Corporation for National and Community Service. Information collected from the Concept Paper and Application is not available.

The Concept Paper and Application request only the minimum information required for proper management and does not duplicate information requested in other reports or available sources.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe the methods used to reduce the burden.

This collection of information does not impact small businesses because they are not eligible to apply for grants. The Corporation for National & Community Service is cognizant of the burdens imposed on sponsor organizations. We have made every reasonable effort to minimize burden imposed by data collection and to invite suggestions and comments from the broadest possible cross-section of sponsor organizations in its information management processes.

6. Describe the consequence to Federal program or policy activities if the collection is or is not conducted less frequently and any technical or legal obstacles to reducing the burden.

Collection of information less frequently would reduce agency oversight of programmatic activities with increased likelihood of problems developing.

Less frequent collection would also compromise the Corporation's ability to capture, aggregate and report performance measures needed to annually report to decision-makers, including the Administration and Congress, including support of annual budgets and reporting Government Performance and Results Act (GPRA) actual yearly totals.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can prove that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require collection of information inconsistent with these guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection before submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments specifically address comments received on cost and hour burdens.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, revealed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years -- even if the collection of information activity

is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

The information collection was published, as a 60 Day Notice, in the Federal Register, Volume 72, Number 194, Tuesday, 9 October 2007, page 57311 as required by 5 CFR 1320.8(d) for the solicitation of comments. No public comments were received in response to this notice.

The 30 Day Notice was published in the Federal Register in Volume 72, Number 247, 27 December 2007, page 73336 as required by 5 CFR 1320.8(d) for the solicitation of comments. No public comments have been received in response to this notice.

9. Explain any decision to provide any payments or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents, other than remuneration for services rendered by contractors or grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No elements of confidentiality are involved so there is no specific assurance; however, information provided by respondents is subject to the Freedom of Information Act and the Privacy Act.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No such information is required to be reported.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Show the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burdens, and explain the reasons for the variance. General estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burdens estimates for each form and aggregate the hour burden in Item 13 of OMB Form 83-1.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

The Corporation for National and Community Service's estimate for the estimated amount of total burden hours, based on the AmeriCorps*VISTA Concept Paper and Application, are broken down below.

These estimated burden hours were calculated based on project input from experience in using the form and collecting the necessary performance data over several years, the web-based grants management, and historical

information and feedback regarding the actual length for sponsor organizations to prepare and submit previous submissions.

This estimated time accounts for the actions associated with the concept paper and application including; review instructions; search existing data resources; gather the data needed; and complete and review the information collection before submitting.

In a calendar year, there will be an estimated 3,200 respondents who will complete the concept paper. 1,000 of these respondents will complete the full application.

The frequencies of these applications are one-time for the Concept Paper and the Application will be completed one-time annually. The average time for completion of the Concept Paper, per response, is 2 hours. The average time completion of the Application, per response, is 15 hours. The frequency of the Progress Report is four times a year for new projects and then twice a year for continuing projects. The average completion time is 7 hours and the average number of Progress Reports received in a year is 5,000. The Progress Report Supplement is completed one-time annually and the average completion time is 9 hours.

Therefore,

3,200 Concept Paper Respondents x 2 hours =	6,400 hours
1,000 Application & Budget Respondents x 15 hours =	15,000 hours
1,100 Progress Report Respondents x 7 hours =	30,800 hours
1,100 Progress Report Supplement Respondents x 9 hours =	9,900 hours
Estimated Total Burden Hours =	62,100 hours annually

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

There are no additional total annual costs burden associated with the revision to this collection of information.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

There are no associated annual costs to the Federal Government with the revision to the concept paper, application, progress report or progress report supplement.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

There are no program changes or adjustments associated with the revision of the concept paper and application.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

None of the collected application information will be publically published. The Progress Report Supplement information will be tabulated by the reporting system and used for aggregate reporting.

Internally, individual Corporation project managers review their respective grantee submissions to ensure quality programming, progress toward work plans, performance measures tracking and achievement, and other elements of project operations. This is the primary tool to update and inform the Corporation about each grantee's progress and status.

Aggregated data is used to report externally to Congress and other audiences as part of the annual performance report, in support of the Government Performance and Results Act (GPRA). Various configurations of data compiled from individual PPRs are used for internal management, and to respond to specific data and information requests.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No such approval is being sought.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions are being sought.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No collection of information employing statistical methods is being sought.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that require the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Corporation for National and Community Services awards funds to states, institutions of higher education, not-for-profit organizations, Indian Tribes and U.S. territories to operate national service programs. The Project Progress Report (PPR) was developed in order to provide a reporting mechanism for grantees to provide information on the progress of their Corporation-funded activities, including specific progress toward Corporate strategic initiatives.

The authority for collecting information in the Project Progress Report is contained in the Domestic Volunteer Service Act of 1973 as amended.

The PPR meets the performance reporting requirements of OMB circulars A-102 and A-110. Per OMB circular A-102, "Federal agencies shall reconcile continuing awards at least annually and evaluate program performance and financial reports. Items to be reviewed include: (1) A comparison of the recipient's work plan to its progress reports and project outputs."

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Project Progress Report was designed to meet agency program management requirements and to ensure that projects address and fulfill legislated program purposes and associated work plan objectives agreed upon in the granting of the award. Information is used by agency management to determine that projects are achieving goals and objectives, gauge progress toward meeting sponsor identified performance measures, identify technical assistance needed to correct deficiencies, manage budget variances and resource issues arising in grants, and help to establish priorities for planning monitoring and oversight activities. If the PPR information were not submitted, the agency would be unable to fulfill these purposes, possibly resulting in inefficient or inappropriate operations.

The revised PPR will be used by AmeriCorps VISTA sponsors and grantees to report progress toward accomplishing project plans, tracking performance measures, identifying technical assistance needed, challenges encountered, and success stories. All of this information provides the Corporation with the knowledge needed to ensure the current grantees are meeting their responsibilities and to help design more effective and efficient programming with future grantees.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technical collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision of adopting that means of collection. Also, describe any consideration of using information technology to reduce the burden.

The Project Progress Report will continue to be submitted through eGrants, the Corporation's web-based grants management system. eGrants is designed to automate the entire grants and project management process from application to closeout. It allows applicants to find funding opportunities, apply for grants or projects, and manage grant reporting online. The system also allows the Corporation to review applications, award grants, and manage those grants and projects efficiently and effectively.

eGrants performs the following roles for the Corporation for National and Community Service: submission and tracking grant applications and concept papers; on-line grant application peer review; negotiating and awarding grants and cooperative agreements; managing grants and cooperative agreements including processing amendments, continuations; and financial status and progress reporting. Other means of submission are available for those with technological difficulty or hardship.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

The Project Progress Report requests only the minimum information required for proper management and does not duplicate information requested in other reports or available from other sources.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe the methods used to reduce the burden.

This collection of information does not impact small businesses because they are not eligible to apply for grants. The Corporation for National & Community Service is cognizant of the burdens imposed on sponsor organizations. We have made every reasonable effort to minimize burden imposed by data collection and to invite suggestions and comments from the broadest possible cross-section of sponsor organizations in its information management processes.

6. Describe the consequence to Federal program or policy activities if the collection is or is not conducted less frequently and any technical or legal obstacles to reducing the burden.

Collection less frequently would reduce agency oversight of programmatic activities with increased likelihood of undetected problems. Less frequent collection would also compromise the Corporation's ability to capture, aggregate and report performance measures needed in the Corporation's annual reporting to decision-makers, including the Administration and the Congress.

The demographic information is being requested less frequently and will, thus reduce the burden on reporting entities.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can prove that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would require the collection of information in any ways than otherwise specified.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection before submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in

response to those comments specifically address comments received on cost and hour burdens.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, revealed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

The information collection was published, as a 60 Day Notice, in the Federal Register, Volume 73, Number 43, 4 March 2008, page 11623 as required by 5 CFR 1320.8(d) for the solicitation of comments. No public comments were received in response to this notice.

The 30 Day Notice was published in the Federal Register in Volume 73, Number 125 on June 27, 2008, page 36404 as required by 5 CFR 1320.8(d) for the solicitation of comments.

9. Explain any decision to provide any payments or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents, other than remuneration for services rendered by contractors or grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No elements of confidentiality are involved so there is no specific assurance; however, information provided by respondents is subject to the Freedom of Information Act and the Privacy Act.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No such information is required to be reported.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Show the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies**

should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burdens, and explain the reasons for the variance. General estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burdens estimates for each form and aggregate the hour burden in Item 13 of OMB Form 83-1.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

The Corporation for National and Community Service's estimate for the amount of total burden hours, based on the AmeriCorpsVISTA Project Progress Report (Part A) and the VISTA Project Report Supplement (Part B) are broken down below.

These estimated burden hours were calculated based upon experience in using the current project progress report form and collecting the required performance data over several years, the web-based grants management system (eGrants) and feedback regarding the actual time for sponsor organizations to prepare and submit the information.

The estimated time amounts for the actions associated with the quarterly Project Progress Report and the annual VISTA Project Report Supplement include reviewing instructions, searching existing data resources, gathering the data needed and entering the information.

For both the Project Progress Report and the VISTA Project Report Supplement, the total number of respondents is 1,000 (comprised of AmeriCorpsVISTA project sponsors).

Estimated time burden for the quarterly Project Progress Report (Part A) is 7 hours per report per respondent per quarter, for a total of 28,000 hours annually.

Estimated time burden for the annual VISTA Project Report Supplement (Part B) is 8 hours per respondent, for a total of 8,000 hours annually.

Adding these totals, the estimated total annual burden is 36,000 hours.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

There is no additional total annual cost burden associated with the revision to this collection of information.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any

other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

There is no annual cost to the Federal Government associated with the revision to the concept paper and application.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

There are no program changes or adjustments associated with the revision of the concept paper and application.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

None of the collected information will be publicly published.

Data and reports are used both internally and externally. Internally, individual Corporation project managers review their respective grantee submissions to ensure quality programming, progress toward work plans, performance tracking and achievement, and other elements of project operations. The PPR is the primary tool to update and inform the Corporation about each sponsor's progress and status.

Aggregated data will be used to report externally to the Congress and other audiences as part of the annual Performance Report, in support of the Government Performance and Results Act (GPRA). Various configurations of data compiled from individual PPR's are used for internal management, and to respond to specific data and information requests.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No such approval is being sought.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions are being sought.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No collection of information employing statistical methods is being sought.