## SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

#### A. Justification

#### A1. Need for Information Collection

The Corporation for National and Community Service (the Corporation) awards grants to states, institutions of higher education, non-profit organizations, Indian tribes, and U.S. Territories to operate AmeriCorps programs. The information collection tool is the grant application which is evaluated and used to make decisions for awarding grants to eligible parties. The collection is divided between new and re-competing grantees, along with those that are applying for continuation of their existing grant. The difference between the two processes is that the continuation application process is a streamlined one.

As you know, the Corporation for National and Community Service (the "Corporation") has amended several provisions relating to the AmeriCorps national service program, and has added rules to clarify the Corporation's requirements for national performance measures, fixed amount grants, and grantmaking criteria to align with the Edward M. Kennedy Serve America Act. In addition, the Corporation's Board of Directors approved the 2011-2015 Strategic Plan on February 8. Since then, we have been working to identify the specific grantee performance measures that will roll up into the agency-wide performance measures outlined in the strategic plan. A final draft of the grantee performance measures were submitted to OMB for approval on July 26. In addition, we have been working to align the Notice of Funding Opportunity with the strategic plan. A final draft of the Notice was submitted for OMB's review and approval on July 28.

The implementation of these changes includes ensuring the Corporation's information collection instruments accurately reflect these issues. In an effort to be compliant while maintaining functions essential to the operations of each state commission and AmeriCorps programs, we are therefore submitting the enclosed request under 5 CFR 1320.13 to OMB for emergency processing and approval of information collection activities.

<u>Public harm is reasonably likely to occur if normal clearance procedures are followed.</u> It is essential to the mission of the Corporation, AmeriCorps, and the state commission grantees that grant Application Instructions are in place to provide enough lead time for commission outreach, resulting in the generation and submission of applications for the agency's annual grant application review process.

States generally conduct their individual application and review processes for their subgrantees in the fall. Adding an extra thirty days to go through the regular OMB approval process will cause undue hardship and public harm as these State commissions will not be able to conduct their state-level competitions and prepare their submissions to the Corporation in a timely manner. In sum, we are requesting emergency approval by

August 15, 2011 because a longer review will not allow states to apply for and receive funding in time to successfully and comprehensively administer funding competitions and manage their AmeriCorps programs.

#### A2. Use of Information

The information collected constitutes an application to the Corporation for grant funding. The Corporation evaluates the application and makes funding decisions through the Corporation's grant review and selection process. The Corporation assembles panels of experts to evaluate new applications. Corporation staff analyzes the results of the panel evaluations. Based on these analyses, the Corporation Chief Executive Officer (CEO) and Board determine applications to support with grant funds. Requests for continued funding (generally programs completing their first or second year of operation) are reviewed by staff. Based on staff analysis, the Director of AmeriCorps, Corporation CEO and Board decide which programs to support for continued funding. The Corporation also uses the information to identify areas in which grant recipients may need training or technical assistance.

#### A3. Minimize Burden: Use of Improved Technology to Reduce Burden

Applicants apply on-line to the Corporation for grant funds using the Corporation's secure system eGrants.

#### A4. Non-Duplication

There are no other sources of information by which the Corporation can meet the purposes described in A2 (above).

### A5. Minimizing Economic Burden for Small Businesses or Other Small Entities

This collection of information does not impact small businesses because they are not eligible to apply for grants. There is no economic burden to any other small entities beyond the cost of staff time to develop the grant application. This is minimized to the degree possible by only asking for the information absolutely necessary to make responsible grant approval decisions.

#### A6. Consideration of Collection

The Corporation will be unable to fulfill its legal obligation of providing grant funding for AmeriCorps if this information were not collected. The Corporation uses the information collected to make grant decisions and to evaluate requests for continued funding. The information collection requires an initial application for funding in the first year and an abbreviated submission for continued funding for the second and third years of a grantee's program. Because funds are awarded on an annual basis, this information cannot be collected less frequently.

## A7. Special circumstances that would cause information collection to be collected in the specified ways.

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

## A8. Provide copy and identify the date and page number of publication in the Federal Register of the Agency's notice.

A Notice of Emergency Request for Clearance was published August xx, 20111, p. xx.

#### **A9. Payment to Respondents**

There are no payments or gifts to respondent

### A10. Confidentiality

Information provided by respondents is subject to the Privacy Act and the instrument includes a Privacy Notice. The information requested on the AmeriCorps Application Instructions is collected pursuant to 42 U.S.C 12592 and 12615 of the National and Community Service Act of 1990 as amended, and 42 U.S.C. 4953 of the Domestic Volunteer Service Act of 1973 as amended. Purposes and Uses - The information requested is collected for the purposes of reviewing grant applications and granting funding requests. Routine Uses - Routine uses may include disclosure of the information to federal, state, or local agencies pursuant to lawfully authorized requests. In some programs, the information may also be provided to federal, state, and local law enforcement agencies to determine the existence of any prior criminal convictions. The information may also be provided to appropriate federal agencies and Department contractors that have a need to know the information for the purpose of assisting the Department's efforts to respond to a suspected or confirmed breach of the security or confidentiality or information maintained in this system of records, and the information disclosed is relevant and unnecessary for the assistance. Executive Summaries of all compliant applications received and applications of successful applicants will be published on the Corporation's website as part of ongoing efforts to increase transparency in grantmaking. This is described in more detail in the *Notice of Federal Funding* Opportunity. The information will not otherwise be disclosed to entities outside of AmeriCorps and the Corporation for National and Community Service without prior written permission. Effects of Nondisclosure - The information requested is mandatory in order to receive benefits.

#### **A11. Sensitive Questions**

The information collection does not include questions of a sensitive nature.

#### A12. Hour burden of the collection

We expect approximately 600 respondents to apply for grant funding from the Corporation. The frequency of response will not be greater than once per year, and should not exceed 40 hours of effort per respondent. There is no estimated annual hour burden outside of the customary and usual business practices. Total burden for this collection will be 24,000 hours.

### A13. Cost burden to the respondent

There is no annual cost burden to respondents.

#### A14. Cost to Government

There is no annual cost burden to the Government outside of customary and usual business practices.

## A15. Reasons for program changes

Program changes have occurred due to reauthorization, subsequent rulemaking, and the approval of the 2011-2016 Strategic Plan.

#### A16. Publication of results

Not applicable because the results of the grant competition will not be published.

# A17. Explain the reason for seeking approval to not display the expiration date for OMB approval of the information collection.

Not applicable.

## A18. Exceptions to the certification statement

There are no exceptions to the certification statement.