

## **SUPPORTING STATEMENT**

### **A. Justification**

#### **A.1 Need for Information Collection**

The proposed survey instruments will support the Corporation for National and Community Service (CNCS) initiatives to collect national, standardized performance data to demonstrate the results of the Senior Companion (SCP) and Foster Grandparent (FGP) programs in two ways: (1) on the benefits realized by frail seniors and their caregivers served by Senior Companions; and (2) on the benefits to the volunteers' health and well-being that can be attributed to volunteering.

#### **A.2 Indicate how, by whom, and for what purpose the information is to be used.**

The information collected from the surveys will be used to analyze and report outcome performance data as referenced in part A.1 above. There are a total of three surveys: (1) Independent Living Survey for clients of Senior Companions; (2) Independent Living Survey for caregivers of clients of Senior Companions; and (3) Benefits to Volunteers Survey for Foster Grandparent and Senior Companion volunteers. The data will be collected via paper survey copies that will be distributed by SCP and FGP grantees to their volunteers and clients. The surveys will be aggregated at the grantee level, and will not contain any personal or attributable information. The data will support national narratives about the value and outcomes of the SCP and FGP programs, specifically benefits to frail seniors and caregivers served, and on the volunteers themselves.

#### **A.3 Minimize Burden: Use of Improved Technology to Reduce Burden**

The nature of SCP and FGP volunteer placement, along with the ages of the volunteers (the majority of volunteers are ages 70+) reinforce the use of paper surveys for the volunteers and the clients. The aggregated information will be entered by the grantees using the CNCS secure online grants management system.

#### **A.4 Non-Duplication**

There are no other sources of information by which CNCS can meet the purposes described in A.2 (above).

#### **A.5 Minimizing for economic burden for small businesses or other small entities.**

This collection of information does not impact small businesses because they are not eligible to serve as grantees or as placement sites for the volunteers. There is no economic burden to any other small entities beyond the cost of staff time to collect and report the data. This is minimized to the degree possible by only asking for the information absolutely necessary to measure progress towards CNCS' strategic initiative benchmarks.

#### **A.6 Consequences of the collection, if not conducted, conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

CNCS will be unable to collect, analyze and report on the measurable outcomes and results for FGP and SCP volunteers and for frail seniors and caregivers served by SCP volunteers. Without these results, CNCS will not have a mechanism to substantiate the return on federal investment or to report key benchmarks included in the CNCS Strategic Plan.

**A.7 Special circumstances that would cause information collection to be collected in a manner requiring respondents to report more often than quarterly; report in fewer than 30 days after receipt of the request, submit more than an original and two copies; retain records for more than three years; and other ways specified in the Instructions focused on statistical methods, confidentiality, and proprietary trade secrets.**

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

**A.8 Provide copy and identify the date and page number of the publication in the Federal Register of the Agency's notice. Summarize the comments received and the actions taken in response to comments. Specifically address comments received on cost and hour burden.**

The 60- day *Notice* soliciting comments was published on Thursday, December 8, 2011 on page 76697. A total of 278 comments were received from 87 commenters. Most individuals providing comments submitted more than one comment each. The commenters represented all three Senior Corps programs in the following proportions: 65 individuals, or 75 percent from RSVP; 2 individuals, or 2 percent from the Foster Grandparent Program; 2 individuals or percent from the Senior Companion Program; 12 individuals, or 15 percent had no program identified; and the remaining 6 individuals, or 6 percent represented a combination of programs. In all cases, the majority of comments were from RSVP, which accounted for a total of 237 comments, or 85 percent of the total comments.

Comments were broken out into eleven discrete categories, as follows:

- (1) The survey is partially or entirely unnecessary: 33 comments or 38 percent of the total. Of the 33 comments, 30 or 91 percent were from RSVP.
- (2) The survey is duplicative of a tool or process already used by respondents: 17 comments or 19 percent of the total. Of the 17 comments, 13 comments or 76 percent were from RSVP.
- (3) The survey places a particularly high burden on RSVP program grantees: 23 comments, or 26 percent of the total. Of the 23 comments, 100 percent were from RSVP.
- (4) The survey is too long, and contains too many questions: 19 comments, or 22 percent of the total. Of the 19 comments, 17 or 89 percent were from RSVP.
- (5) The survey is partially or entirely irrelevant: 20 comments, or 23 percent of the total. Of the 20 comments, 17 or 85 percent were from RSVP.
- (6) The survey represents too great a time burden: 40 comments or 46 percent of the total. Of the 40 comments, 72 percent were from RSVP.
- (7) The survey should be conducted as a sample, rather than the proposed census: 15 comments or 17 percent of the total. Of the 15 comments, 14 or 93 percent were from RSVP.
- (8) The survey is too costly: 47 comments or 54 percent of the total. Of the 47, 41 comments or 87 percent were from RSVP.

- (9) The survey contains invasive questions that would be perceived as encroaching on the privacy of the respondents: 29 comments or 33 percent of the total. Of the 29 comments, 24 or 83 percent were from RSVP.
- (10) The program model makes it difficult to reach the clients in order to conduct the survey: 32 comments or 37 percent of the comments. Of the 32 comments, 29 or 91 percent were from RSVP.
- (11) The condition of clients, such as Alzheimer's Disease or dementia, would make it difficult to survey some number of clients: 3 comments or 3 percent of the total. All three of the comments were from representatives of the Foster Grandparent or Senior Companion programs.

In summary, 85 percent of the comments were submitted by individuals representing the RSVP program. The comments from RSVP reflected concerns in every category, with particularly emphasis on time burden, cost, and direct client contact due to the program model.

CNCS concurs that, due to the scope, magnitude, and decentralized volunteer placement structure of RSVP, the survey is less aligned with RSVP than with the Foster Grandparent and Senior Companion programs.

Based on the comments received, CNCS will exempt RSVP grantees from a mandatory requirement to use the survey as a means to collect client performance data and volunteer benefit data. CNCS will offer RSVP the opportunity to participate solely on a voluntary basis. CNCS believes that this exemption addresses the concerns of the majority of commenters. The survey will be required of Foster Grandparent and Senior Companion program grantees.

CNCS will make the following modifications in response to the comments:

- (1) The survey is partially or entirely unnecessary: 33 comments or 38 percent of the total. Of the 33 comments, 30 or 91 percent were from RSVP. Response: CNCS believes the survey will yield significant data in the FGP and SCP programs. RSVP grantees will not be required to participate.
- (2) The survey is duplicative of a tool or process already used by respondents: 17 comments or 19 percent of the total. Of the 17 comments, 13 comments or 76 percent were from RSVP. Response: CNCS believes the survey will provide new data to demonstrate national outcome data in the FGP and SCP programs. RSVP grantees will not be required to participate.
- (3) The survey places a particularly high burden on RSVP program grantees: 23 comments, or 26 percent of the total. Of the 23 comments, 100 percent were from RSVP. Response: Due to the scope and decentralized placement of RSVP volunteers, CNCS concurs and will exempt RSVP from required participation in the survey.
- (4) The survey is too long, and contains too many questions: 19 comments, or 22 percent of the total. Of the 19 comments, 17 or 89 percent were from RSVP. Response: CNCS modified the survey tools by dividing one consolidated tool into three separate instruments. The Independent Living Surveys – comprising one instrument for clients (primarily frail seniors) served by Senior Companions and one instrument for caregivers of clients served by Senior Companions, were restructured to contain a total of ten questions each. The survey is formatted for ease of use, with the client or surrogate circling the correct response to each question. The Benefits to the Volunteer Survey is now a separate instrument in a similar

format. Additionally, the Benefits to the Volunteer Survey frequency of use was changed from annual to one-time. The Independent Living Surveys will remain annual.

- (5) The survey is partially or entirely irrelevant: 20 comments, or 23 percent of the total. Of the 20 comments, 17 or 85 percent were from RSVP. Response: CNCS believes the data to be collected through the survey is relevant to both the volunteer experience and the outcomes to clients and caregivers receiving respite. RSVP will not be required to participate in the survey.
- (6) The survey represents too great a time burden: 40 comments or 46 percent of the total. Of the 40 comments, 72 percent were from RSVP. Response: comments about the length of the survey, CNCS reformat the survey into individual instruments that each focus on one discrete dimension of performance.
- (7) The survey should be conducted as a sample, rather than the proposed census: 15 comments or 17 percent of the total. Of the 15 comments, 14 or 93 percent were from RSVP. Response: The method original envisioned is that all clients and caregivers receiving independent living support and/or respite, and all volunteers would participate. While RSVP will not be required to participate in the survey, there may be some opportunity to engage in a separate evaluation-focused activity that would use a sampling model.
- (8) The survey is too costly: 47 comments or 54 percent of the total. Of the 47, 41 comments or 87 percent were from RSVP. Response: CNCS determined that RSVP would be exempt from participating in the survey process.
- (9) The survey contains invasive questions that would be perceived as encroaching on the privacy of the respondents: 29 comments or 33 percent of the total. Of the 29 comments, 24 or 83 percent were from RSVP. Response: CNCS will eliminate or de-identify the data received so that individual responses cannot be linked back to specific respondents.
- (10) The program model makes it difficult to reach the clients in order to conduct the survey: 32 comments or 37 percent of the comments. Of the 32 comments, 29 or 91 percent were from RSVP. The Senior Companion Program grantees did not raise this as a core issue, and the model supports access to the assigned clients and volunteers. Response: CNCS will not require RSVP grantees to participate in the survey.
- (11) The condition of clients, such as Alzheimer's Disease or dementia, would make it difficult to survey some number of clients: 3 comments or 3 percent of the total. All three of the comments were from representatives of the Foster Grandparent or Senior Companion programs. Response: CNCS will incorporate alternative protocols or methods, such as observation, to collect survey data.

### **A.9 Payment to Respondents**

There are no payments or gifts to respondents.

### **A.10 Assurance of Confidentiality and its basis in statute, regulation, or agency policy.**

The information provided in this collection will be held solely by grantees and CNCS staff. In the even that aggregated data are used for analysis or for evaluation purposes, any personal identifying information will be removed.

### **A.11 Sensitive Questions**

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

### **A.12 Hour burden of the collection**

The total annual hour collection burden is estimated at 60,000 hours. This estimate is based on the following:

Total Respondents:

- (1) Independent Living Survey for Senior Companion Clients: 64,000 respondents at 30 minutes per survey for a total of 32,000 hours.
- (2) Independent Living Survey for Caregivers of Senior Companion Clients: 10,000 respondents at 30 minutes per survey for a total of 5,000 hours.
- (3) Benefits to Volunteer Survey for FGP and SCP: 46,000 respondents at 30 minutes per survey for a total of 23,000 hours.

Frequency: Independent Living Surveys for Clients and Caregivers: Annual.

Benefits to the Volunteer Survey: One-time.

Average Time Per Response:

Independent Living Surveys for Clients and Volunteers: 30 minutes per survey.

Benefits to Volunteer Survey: 30 minutes per survey.

### **A.13 Cost burden to the respondent**

Not applicable.

### **A.14 Cost to Government**

There are no additional costs to the Government.

### **A.15 Reasons for program changes or adjustments in burden or cost.**

The 60-day Federal Register Notice estimated total annual respondents at 767,800, with a total annual hour burden of 395,000 hours. Upon receiving comments through the 6-day Notice process, CNCS determined that RSVP program grantees would not be required to participate in the performance survey process. The mandatory participation by Foster Grandparent and Senior Companion programs grantees will remain. This change adjusted the total respondent and hour burden by 85 percent. The adjusted burden, as indicated in the 30-day Federal Register Notice is 120,000 annual respondents, with a total annual burden of 60,000 hours.

### **A.16 Publication of results**

Not applicable, because the responses to this information will not be published. Only aggregate responses will be published.

### **A.17 Explain the reason for seeking approval to not display the expiration date for OMB approval of the information collection.**

Not applicable.

**A.18 Exceptions to the certification statement.**

There are no exceptions to the certification statement in the submitted ROCIS form.