
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 State, AmeriCorps National, AmeriCorps NCCC, AmeriCorps VISTA, and Senior Corps programs. This information collection comprises the information that CNCS staff use to monitor progress of AmeriCorps State and National grantees and to respond to requests from Congress and other stakeholders.

A2. Indicate how, by whom, and for what purpose the information is to be used.

AmeriCorps State and National grantees respond to the questions included in these instructions in order to provide information that CNCS will use to monitor grantee progress and to report on AmeriCorps member activity.

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

The Corporation will be eliciting and accepting grantees' response to these questions electronically via eGrants, the Corporation's secure online grants management system.

A4. Non-Duplication

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

A5. 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 apply for grants. 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 the Corporation's strategic initiative benchmarks.

A6. Consequences of the collection if not conducted, conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The Corporation will be unable to monitor and report on grantee progress without approval of this collection.

A7. 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, confidentially, and proprietary trade secrets.

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. Summarize comments received and actions taken in response to comments. Specifically address comments received on cost and hour burden.

The 60 day *Notice* soliciting comments was published on Monday, July 22, 2013 on page 43862. Seven entities provided comments. Individual comments and the disposition of each are addressed below.

Three commenters asked which grantees and subgrantees complete which version of the GPR and whether separate sets of instructions are needed for state commissions. Commission subgrantees and national grantees that were new or recompetite applicants during the 2013 competition are subject to the new GPR instructions. All other subgrantees and national grantees are subject to the old instructions as revised in this clearance. Commissions that have both types of subgrantees on the same prime grant will complete two separate progress reports, one for each type of grantee. Starting with the 2014 grant year, all subgrantees and national grantees will use the new instructions.

The following chart illustrates which 2013 grantees and subgrantees are subject to which set of GPR instructions:

Type of Grantee	Type of applicant in 2013	Old GPR Instructions	New GPR Instructions	Notes
National	New or recompetite		X	
	Continuation	X		
State Subgrantee	New or recompetite		X	Commission completes one prime GPR for this set of subgrantees.
	Continuation	X		Commission completes one prime GPR for this set of subgrantees.

CNCS will continue to use one set of instructions for all grantees. The reporting screens are nearly identical for state commissions and national grantees, more so than in the previous iteration of the GPR, which had a single set of instructions.

Five commenters stated that the burden of the new GPR is higher than the old GPR and that the burden is higher for state commissions than it is for national grantees. While the change in the way MSYs are reported will increase burden, we believe that this is balanced by the reduction in the number of demographic indicators and, for state commissions, a decrease in burden associated with providing explanations regarding formula subgrantees, which is no longer required. Also, automated completion checks will not allow incomplete progress reports to be submitted which will result in less back and forth between CNCS and grantees. Lastly, CNCS has decided to collect MSY data at the strategic plan level only, not at the performance measure level, to minimize burden.

CNCS acknowledges that the level of burden is higher for some commissions with a large number of subgrantees or multiple prime grants than for other commissions and national grantees. Based on comments and the inclusion of the final GPR due at grant closeout, CNCS has increased the burden estimate.

Four commenters focused on the timeline and testing of the new GPR. CNCS cannot delay the new GPR. Very little new information is required to complete this report. Although the demographic indicators have been revised, all new indicators are optional. No changes have been made to mandatory demographic indicators or to the information collected in the performance measures section of the GPR. The narrative questions require synthesis of information about program activity that is readily available through routine monitoring and technical assistance that is already being conducted. The due date of the end-of-year GPR will not change. Three rounds of user acceptance testing were completed by AmeriCorps program staff in June and July 2013.

Three commenters focused on changes in the demographics tab concerning what is being collected and the utility of some indicators. The demographic indicators have been revised so that they are consistent with the CNCS strategic plan and the Serve America Act.

Three commenters focused on the Member Service Year (MSY) tab and the burden associated with reporting MSYs and member activity. Reporting MSYs and member activity at the level of strategic plan objective, rather than focus area, is critical for CNCS to understand the value of its investment relative to its strategic plan. Member counts at the strategic objective level allow CNCS to state how many members are performing activities under each strategic plan objective. CNCS has chosen not to collect MSY and member activity data at the performance measurement level, thereby reducing burden.

Six commenters focused on CNCS's expectation that programs aim to achieve 100% retention, reliance on data from the portal, and the mechanisms for providing comments on this data. The data in the performance indicator tab (enrollment, retention, 30-day enrollment and 30-day exit data) will refresh for each reporting period. In response to comments, CNCS will only require this tab for the end-of-year GPR due in October 2014 and each year thereafter, and the instructions have been updated to reflect this change. CNCS will request an IT enhancement to add a warning to the performance indicators tab that the data cannot be refreshed once it has been

populated. CNCS recognizes that retention rates may vary among effective programs depending on the program model. CNCS will continue to request explanations for any retention rate below 100%. Text boxes are provided for grantees to comment on data from the portal that requires explanation.

Three commenters focused on requiring explanations for incomplete data (performance indicators and performance measures) in the mid-year GPR. CNCS will not include the performance indicators tab in the mid-year GPR. We have updated the instructions for the mid-year GPR with instructions to enter “NA” in the outcome explanation fields as it is a system requirement that some text be entered in these fields.

Two commenters focused on changes in the performance measurement data collected. The performance measure section of the new GPR requires no data that was not collected in the old GPR.

One commenter suggested that CNCS should collect performance measurement data as percentages rather than numerical values. Whole numbers are required so that data can be aggregated across programs.

Five commenters stated that instructions for narrative questions are not clear to state commissions. We have added additional information in the instructions to clarify how state commissions should address the narrative questions.

Description: CNCS is seeking approval of AmeriCorps State and National Grantee Progress Report, which is used by grantees to provide information for CNCS staff to monitor grantee progress and to respond to requests from Congress and other stakeholders.

A9. Payment to Respondents

There are no payments or gifts to respondents

A10. Assurance of Confidentiality and its basis in statute, regulation, or agency policy.

Information provided by this collection will be held solely by grantees and CNCS staff.

A11. Sensitive Questions

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

A12. Hour burden of the collection

This is the AmeriCorps State and National Grantee Progress Report.

We expect approximately 154 respondents to complete the progress report. The frequency of response is biannual. In the last year of the three year grant cycle, one additional final report is required. There is no estimated annual hour burden outside of the customary and usual business practices.

A13. Cost burden to the respondent

There are no additional costs to the respondent.

A14. Cost to Government

There are no additional costs to the Government.

A15. Reasons for program changes or adjustments in burden or cost.

Not applicable.

A16. Publication of results

Not applicable because the responses to this information collection 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 in the submitted ROCIS form.