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# **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS**

## **A. Justification**

### **A1. Need for Information Collection**

The Corporation for National and Community Service (CNCS) 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, Social Innovation Fund and Senior Corps programs. This information collection consists of the questions AmeriCorps VISTA sponsors respond to in order to report on progress against their approved application to CNCS.

The Project Progress Report (PPR) is an official reporting tool that requires sponsors of the AmeriCorps VISTA program to document project accomplishments during a certain reporting period, as well as challenges, support provided to VISTA members, and technical assistance needs. CNCS personnel use the PPR to assess progress and to determine what feedback, technical assistance or other interventions are needed.

The PPR helps sponsors and CNCS personnel to see whether sponsors are operating the project in accordance with the approved application, VISTA policies and regulations and whether sponsors are making adequate progress toward achieving the results specified in their approved application.

In Fiscal Year 2014, AmeriCorps VISTA adapted its AmeriCorps VISTA Project Application to include new OMB-approved national performance measures. The proposed, revised PPR incorporates the new national performance measure framework and allows sponsors to enter actual data and progress towards plans and targets set in the Project Application.

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

AmeriCorps VISTA sponsors complete PPRs electronically via the CNCS web-based application system, eGrants. The information is used to document project accomplishments during a certain reporting period, as well as challenges, support provided to VISTA members, and technical assistance needs. CNCS personnel use the PPR to assess progress and to determine what feedback, technical assistance or other interventions are needed.

The PPR also helps sponsors and CNCS personnel to see whether sponsors are operating the project in accordance with the approved application, AmeriCorps VISTA policies and regulations and whether sponsors are making adequate progress toward achieving the results specified in their approved application.

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

The PPR is a component of the CNCS electronic grants management system, eGrants. As an integrated module, eGrants is configured to integrate the PPR with the data entered by the sponsors in the awarded applications.

### **A4. Non-Duplication**

There are no other sources of information by which CNCS 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 AmeriCorps VISTA resources. 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 assess progress towards results.

### **A6. 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 document and report results of resources approved in the AmeriCorps VISTA program portfolio. CNCS will also be out of compliance with the OMB Circular requirements for grants and progress reports..

### **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 these ways.

### **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 February 20, 2014 on page 10498. CNCS received comments on this information collection request.

One set of comments was in regard to the Member Development section of the Project Progress Report. One comment expressed appreciation for the change in how

applicants report information in this section. Specifically, respondents are now asked to report the number of hours of member development opportunities provided to AmeriCorps VISTA members, where previously respondents were asked to report the number of AmeriCorps VISTA members that received member development opportunities. The commenter stated that counting hours will be less burdensome for respondents.

A second comment regarding the Member Development section suggested providing more detailed definitions of the individual member development areas. CNCS lists these member development areas (which include Community Volunteer Generation/Recruitment, Effective Volunteer Management, and Grantwriting) without detailed definition because they are broad functions that are reflected in the assignment descriptions of VISTA members. CNCS believes their meaning is understandable to individuals involved in sponsoring a VISTA project.

A third comment regarding the Member Development section was a suggestion to provide a higher character limit for the “Other” line than has been allowed in the past. CNCS notes that the character limit for respondents to provide professional development information for the “Other” area is higher than it has been in the past in the CNCS eGrants system and is of sufficient size to capture professional development information.

A fourth set of comments focused on the Demographics section of the Project Progress Report. One comment noted a lack of clarity on whether respondents are being asked to provide information about a duplicated or unduplicated count of community volunteers who are recruited and managed. Another comment expressed a preference for one combined count that reflects community volunteers who are recruited and managed. CNCS notes that the measures included in the Demographics section are a subset of the CNCS National Performance Measures, which include specific definitions and data collection standards for each measure. Those standards require that the total number of volunteers recruited and managed is an unduplicated count and that respondents control for double counting or select the measure that best fits their program model.

To clarify this requirement in the Project Progress Report, CNCS amended the Demographics section by creating one response line for community volunteers recruited and a separate response line for community volunteers managed. CNCS also added language that refers respondents to the definitions and data collection standards for each measure and thus the requirement to report an unduplicated count.

CNCS also created one line for respondents to report the number of hours of service contributed by community volunteers and a separate line for respondents to report the number of hours of service contributed by community volunteers managed. CNCS also added language that refers respondents to where they can find the definitions and data collection standards for those measures, as well as every other measure in this section.

The fifth set of comments focused on the Performance Measure section of the Project Progress Report. One comment asked whether the instructions were requiring

respondents to report on data collected for performance measures for the project in the aggregate or for each VISTA member individually. The CNCS requirement is neither. The CNCS requirement is for respondents to report progress with respect to each individual performance measure set that the respondent identified in their approved application. An individual performance measure set is based on the unique combination of a site and a capacity goal and may represent the activities of multiple VISTA members.

To further clarify the requirement, CNCS amended the Performance Measurement section to require respondents to enter data for each individual performance measure set that was created in the application. The CNCS eGrants system will also automatically display each performance measure set for which respondents must enter data, further clarifying the requirement.

Other comments regarding the Performance Measure section expressed the preference that CNCS require respondents to report data for the project in the aggregate rather than at the individual performance measure set level and offered an opinion that data reported in disaggregated fashion would be burdensome for respondents to provide and would not result in meaningful information for CNCS.

CNCS acknowledges that the level of burden may be higher for some respondents to report on individual performance measure sets and has increased the burden estimate. CNCS notes that the increased burden stems from additional data entry into the CNCS eGrants reporting system and is not a burden caused by additional data collection or other reporting steps peculiar to reporting to CNCS on individual performance measure sets.).

Further, given the unique and complex nature of capacity building activities, CNCS believes that the information reported at an individual performance measure set level will provide meaningful and valuable information about how respondents are using VISTA resources in a way that an aggregate cannot.

The intent of VISTA resources is to build capacity of individual organizations and programs to address poverty. Even sites that have similar capacity goals and performance measures – as expressed in individual performance measure sets - may achieve results at different rates, need different levels of VISTA resources to make progress, or require different types of service activities from VISTA members. Reporting data on individual performance sets is necessary for respondents, CNCS, and other stakeholders to monitor this variability of resources, aspirations and accomplishments, both to assist in the accomplishment of the individual project as well as to support the continuous improvement of the VISTA program as a whole.

## **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 may be shared with external parties in furtherance of CNCS’s mission. This could include, but is not limited to, sharing the information with Congress and other federal, state, local, or tribal governments.

The following Privacy Act Notice will be included on this information collection request: The information requested is collected pursuant to 42 U.S.C 12592 and 12615 of the National and Community Service Act of 1990 as amended, 42 U.S.C. 4953 of the Domestic Volunteer Service Act of 1973 as amended, and 42 U.S.C. 12639. 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. If a grant application: Executive Summaries of all compliant applications received and applications of successful applicants will be published on the CNCS 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 CNCS 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**

CNCS originally estimated 36,000 total hours of burden associated with the PPR. The estimate was derived from a total of 300 first-year respondents completing the PPR four times a year (15 hours per response) and 600 respondents completing the PPR two times per year (15 hours per response). Based on the comments, we have now revised the total hours and the burden hours as follows:

The new revised estimate is 48,000 hours annually. This estimate is based on a change to the number of hours per response, which we raised from 15 hours to 20 hours.

**A13. Cost burden to the respondent**

There is no cost 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.**

The burden adjustment is to reflect respondent data entry time for reporting information related to individual performance measure sets in the eGrants system.

**A16. Publication of results**

Not applicable because the responses to this information collection will not be published. Aggregated data may be 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.

**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.