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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) requires grantees of AmeriCorps State and National, Commission Support Grant, Commission Investment Fund, and the Volunteer Generation Fund to submit Grantee Progress Reports (GPRs). This information collection comprises the questions that grantees of these grant programs will answer to report progress to CNCS.

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

Grantees respond to the questions included in the Grantee Progress Report to describe their progress toward the activities and goals of their grants.

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

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

### **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 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 necessary to assess grantee progress.

### **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 request the necessary information to assess grantee progress.

### **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 Tuesday, February 26, 2019 on pages 6136-6137. Three comments were received. Below is a detailed response to each of the concerns raised:

- Commenter #1 asked CNCS to avoid reinstating the mid-year report. CNCS agrees and does not plan to do so.
- Commenter #1 encouraged CNCS to change “100%” to “the policy” in the section on enrollment/retention under “explanations”. In response to this comment, CNCS changed “100%” to “the level required by policy.”
- Commenter #1 encouraged CNCS to share with grantees the GPR questions and requirements as part of the application process and notice of grant award. CNCS currently maintains a public website where all GPR questions and requirements are posted as soon as they are cleared. CNCS will continue to make that website publicly available to grantees throughout the application and award process.
- Commenters #2 and 3 expressed concerns that the five additional AmeriCorps-member-focused demographic indicators would represent a significant increase in data collection requirements and associated time burden.

These concerns were the result of a CNCS error in the instrument document that was uploaded to regulations.gov as supplemental to the 60-day Notice. This document omitted the following heading from these five questions: “Optional for all grantees.” The error has since been corrected in the instrument document. The commenter had not in the past and will not in the present be required to answer these questions. These questions are only answered by a relatively small number of programs with member-focused outcome targets, such as programs that recruit at-risk youth or include member development as a key component of their Theory of Change.

- Commenter #2 expressed concern regarding low return rates for surveys conducted post-exit. In response, CNCS clarified that the optional questions were included as a courtesy to grantees that are already collecting the information because they had selected this performance measure in the past and/or their

programs focus on job-related outcomes. Grantees who choose to report on these measures have the freedom to decide how and when to collect the data based on their Theory of Change and existing data systems, so there is no need for them to utilize a post-exit survey if they are concerned about the potential for a low response rate.

- Commenters #2 and 3 recommended that the AmeriCorps-member-focused demographic indicators be collected via the Member Exit Survey instead of the Grantee Progress Report. In response, CNCS will explore whether the Member Exit Survey can be modified to accommodate these data collection questions in future grant cycles. Because the Member Exit Survey is currently in use by multiple grant programs, CNCS will not be able to make these modifications in the current grant cycle.

**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.**

Your responses to this information collection will be disclosed as appropriate unless prohibited by law.

**A11. Sensitive Questions**

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

**A12. Hour burden of the collection**

These are the Grantee Progress Report instructions for AmeriCorps State and National, Commission Support Grant, Commission Investment Funds, and the Volunteer Generation Fund.

We expect approximately 150 respondents (representing 300 unique responses) to use the AmeriCorps State and National GPR instructions, 52 respondents to use the Commission Investment Funds and Commission Support Grant GPR instructions, and 20 respondents to use the Volunteer Generation Fund instructions. The frequency of response for AmeriCorps State and National Grantees will not be greater than semi-annual with an additional final report required at the end of the three-year award period and should not exceed 22 hours per respondent. The frequency of response for all other grantees will be annual and should not exceed 10 hours of effort per respondent.

GPR Instructions Type	Number of Responses	Hours per Response	Total Hours
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AmeriCorps State and National	300	10	3300
Commission Investment Funds	52	10	520
Commission Support Grant	52	10	520
Volunteer Generation Fund	20	10	200
	424	40	4240

**A13. Cost burden to the respondent**

There is no cost to the respondent.

**A14. Cost to Government**

Development, review, and oversight of the data collection will require approximately 10% of the staff time for one Pay Band 4 employee (\$12,500 per year) and approximately 1% of the staff time for 110 Pay Band 3 employees (\$66,000 per year), for a total of \$78,500 annually.

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

The burden has been adjusted to reflect actual usage.

**A16. Publication of results**

Some results of this grant competition will be used in public materials to document the accomplishments of CNCS grantees.

**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.