

Corporation for National and Community Service (AmeriCorps)
Diversity Questionnaire
OMB Control Number 3045-0193
Justification – Part A Supporting Statement

This information collection addresses the diversity of two populations – the people being served by AmeriCorps resources and partners of AmeriCorps. It aims to collect the proposed (i.e., projected) reach of beneficiaries of the AmeriCorps investment, disaggregated by poverty status, as well as demographic information. It also collects demographic information about the Board of Directors, senior leadership and staff of organizations that are applying for AmeriCorps resources. The demographic information is racial/ethnic identification, gender, LGBTQIA+, disability, and veterans' status.¹

- This is a Revision to an Existing Collection. AmeriCorps also seeks to continue using the currently approved information collection until the revised information collection is approved by OMB. The currently approved information collection is due to expire on 3/31/2022.
- The form used for this information collection is a Diversity Questionnaire.
- Changes to the questionnaire include separating the requested data into two sections for project information and organizational information to be more user-friendly, adding additional basic organizational information to better track to data in AmeriCorps' systems, clarifying the instructions based on feedback, including clarity on the usage of the data to be collected, adding definitions based on feedback and aligning definitions with the rest of the revisions to the tool.
- The burden estimates are also increasing because AmeriCorps revised the amount of time estimated to complete the questionnaire from 30 minutes to 5 hours to account for the time it would take an organization to collect and analyze the data (previously not included) as well as time to complete the questionnaire. The burden has also increased as AmeriCorps also plans to use the Diversity Questionnaire in all of the following programs, while the current OMB Control Number covers only the first:
 - AmeriCorps State & National
 - Volunteers in Service to America (VISTA)
 - National Civilian Community Corps (NCCC)
 - AmeriCorps Seniors.

Respondents will include all applicants, sponsors and grantees (businesses and organizations, and State and local governments) seeking funding or resources in the above programs. In AmeriCorps' grant making processes, the questionnaire will be submitted electronically by the grantee or applicant as part of the grant application. In AmeriCorps' directly managed programs such as NCCC, the questionnaire will be used to collect data from sponsor applicants. If the applicant is accepted as a grantee or sponsor, the grantee or sponsor will then provide updated information annually, as explained below. Staff from each of AmeriCorps' Program Teams and the Office of Regional Operations will be available to provide individualized assistance, if needed, to organizations filling out the questionnaire.

¹ This information collection does not cover individual AmeriCorps State and National, VISTA or NCCC members and AmeriCorps Seniors volunteers.

1. Need & Method for the Information Collection

This information collection is necessary to track progress against our targets and metrics for our goals, objectives and strategies, as outlined in AmeriCorps' Strategic Plan and as informed by Executive Order 13985, *Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (E.O. 13985). The federal government is responsible for affirmatively advancing civil rights, racial justice, and equal opportunity for all as outlined in E.O. 13985. AmeriCorps takes this responsibility seriously, and in its Strategic Plan, has committed to partner with communities to alleviate poverty and advance racial equity (Goal 1). The target over the next 5 years is to ensure that **40% of all those served by AmeriCorps members and AmeriCorps Seniors volunteers are people in poverty.** (AmeriCorps uses "people in poverty" as its proxy measure for "underserved," recognizing that data shows that a higher proportion of people in poverty are people of color and other minority populations.) In accordance with this target, over the next 5 years, AmeriCorps will prioritize investment in the most underserved individuals and communities, through strategies such as: prioritizing awards to programs and projects focused on serving underserved populations; increasing outreach, engagement, and partnership development to expand and diversify the community organizations that successfully operate and support AmeriCorps programs; increasing technical assistance and support to organizations serving underserved communities; and launching planning grants to help small and new-to-AmeriCorps organizations leverage AmeriCorps programs.

To measure its progress in meeting these goals, AmeriCorps needs to collect data about the reach of our programs to invest in underserved individuals and communities and the diversity of the community organizations that operate and support AmeriCorps programs.

AmeriCorps has evaluated existing data sets such as the U.S. Census poverty data as well as existing data collections and has determined that they are not adequate. U.S. Census data can provide general information about the people being served in counties in which AmeriCorps participants serve, but it cannot provide information specific to projects and could easily under-represent or over-represent the percentage of project beneficiaries who are people in poverty and the demographic information about people served by the AmeriCorps-funded activity. Currently, AmeriCorps collects the following data about the people being served by AmeriCorps resources: AmeriCorps State & National, AmeriCorps VISTA, and AmeriCorps Seniors programs collect data about the number of project beneficiaries who are veterans and military families. The Foster Grandparent and Senior Companion programs also collect data about the disability status of beneficiaries.

AmeriCorps currently does not collect comprehensive information about the reach of our programs to invest in underserved individuals and communities, nor does it collect information about the diversity of the community organizations that operate and support AmeriCorps programs.

The information to be collected in the AmeriCorps Diversity Questionnaire Form, provided to prospective and current grantees and sponsors, will fill these data gaps. The Diversity

Questionnaire aims to collect the projected and actual reach of beneficiaries of the AmeriCorps investment, disaggregated by poverty status, as well as demographic information. It also collects demographic information about the Board of Directors, senior leadership and staff of organizations that are applying for AmeriCorps resources. The information received through the Diversity Questionnaire Form will enable AmeriCorps to: a) prioritize awards to programs and projects focused on people in poverty and better understand the demographic characteristics of the people served by AmeriCorps programs; and b) better understand the demographics of the Board, leadership and staff of organizations that are applying for AmeriCorps resources in order to improve outreach, engagement, and partnership development.

- The statutes that authorize this collection are the National and Community Service Act of 1990, as amended (NCSA) and the Domestic Volunteer Service Act of 1973, as amended (DVSA). The NCSA specifically states that the CEO should identify and implement methods of recruitment to increase the diversity of participants in the programs receiving assistance under the national service laws and increase the diversity of service sponsors of programs receiving assistance under national service laws. *See* 42 U.S.C. 12651d. A purpose of the DVSA is to eliminate and alleviate poverty and poverty-related problems in the United States by encouraging and enabling persons from all walks of life, including low-income individuals to perform volunteer service. *See* 42 U.S.C. 4951. Additionally, the NCSA requires AmeriCorps to continually evaluate programs that receive assistance under the NCSA and DVSA to determine their impact and effectiveness. *See* 42 U.S.C. 12639.
- Neither statute imposes a deadline for this collection; however, AmeriCorps committed in its strategic plan to a target over the next 5 years of 40% of all those served by AmeriCorps members and AmeriCorps Seniors volunteers being people in poverty. To reach this goal, AmeriCorps committed to partnering with communities to alleviate poverty and advance racial equity and prioritizing investment in the most underserved individuals and communities.
- The information will be collected through the AmeriCorps Diversity Questionnaire in an electronic format, as explained in response to Question 3, below.
- At an organizational level, the collection of information will be overseen by all applicants for and recipients of AmeriCorps' funding and resource allocation. Staff from AmeriCorps' Program Teams and Office of Regional Operations will be available to provide guidance and training to organizations filling out the form.
- The forms will all be electronically fillable.
- If this information is not collected, AmeriCorps will continue to have data gaps about the reach of our programs to invest in underserved individuals and communities and about the diversity of the community organizations that operate and support AmeriCorps programs.

2. Use of the Information

The Diversity Questionnaire collects information about two populations – (1) the **people being served** by AmeriCorps resources and (2) **partners** of AmeriCorps – and is divided into two sections.

1. *People Being Served by AmeriCorps Resources*

One purpose of the Diversity Questionnaire is to provide AmeriCorps with detailed, project-specific information about the people being served so that AmeriCorps can measure whether it is reaching underserved communities.

First, the Diversity Questionnaire asks for the total number of beneficiaries to be served by the proposed project and the number of beneficiaries (direct and indirect) who are living in poverty. AmeriCorps will take this poverty data into account in its grantmaking and resource allocation decisions to better reach those who are underserved. For competitive grantmaking, for example, this percentage will factor into the evaluation criteria for resource allocation decisions. At the application stage, applicants will provide their projected numbers of beneficiaries they plan to reach, disaggregated by poverty status. AmeriCorps proposes to track this information across the cycle of the grantee/sponsor's engagement with AmeriCorps by requesting the actual number of total beneficiaries reached, disaggregated by poverty status, in the Progress Report Supplements for VISTA and AmeriCorps Seniors, the Annual Grantee Progress Report for AmeriCorps State and National, and the Project Completion report for NCCC.

Second, the Diversity Questionnaire also requests demographic data of the people to be reached by the proposed project. This will not factor into grantmaking and resource allocation decisions. As AmeriCorps has never collected complete demographic data of beneficiaries in the past, the agency has no baseline for who is reached by its resources in terms of demographics. This will give AmeriCorps a deeper understanding of who is being served by AmeriCorps programs to inform future work. Similar to poverty status, the proposed information will be requested at the application stage. In the future, AmeriCorps intends to request actual numbers related to demographic data in the Progress Report Supplements for VISTA and AmeriCorps Seniors, the Annual Grantee Progress Report for AmeriCorps State and National, and the Project Completion report for NCCC.

2. *Partners of AmeriCorps*

AmeriCorps is seeking to expand and diversify the community organizations that successfully operate and support AmeriCorps programs. The Diversity Questionnaire will collect demographic data about staff, leadership and Board members of the organization applying for an AmeriCorps resource. It will enable AmeriCorps to better target training, technical assistance, and outreach to grantees and sponsors, in particular those who are new to AmeriCorps. This information will not be included in grantmaking and resource allocation decisions.

The Diversity Questionnaire should be filled out by all prospective grantees and sponsors as well as existing partners who are applying for new or continued resources, and it should be completed “to the best of their ability.”

Although it will very valuable data, AmeriCorps understands that this requested information may be new for some grantees and sponsors. Organizations may not have systems currently in place to collect this information, and to fill out the Diversity Questionnaire with collected information. It may take some time to build an organization's capacity to collect and report on this data.

AmeriCorps is committed to engaging stakeholders in ways to improve the tool and provide assistance through guidance and training.

- To date, the information collected through the existing collection, applicable to AmeriCorps State and National only, has been used by AmeriCorps to serve as a baseline for broader data collection. Through this baseline, AmeriCorps is assessing the design of the Diversity Questionnaire and the quality of the data submitted by existing and prospective partners of AmeriCorps. Currently, it is an incomplete data set. It has not been used in grant or resource allocation decision making.
- This information is solely for AmeriCorps and will not be used by other federal agencies.

3. Use of Information Technology

The information will be collected in electronically from all applicants for AmeriCorps' funding and resource allocation. Current plans are for NCCC to use a fillable PDF and possibly transition to Qualtrics, for VISTA and AmeriCorps Seniors to use Survey Monkey, and for AmeriCorps State and National to use MS Excel. All the AmeriCorps programs are willing to adjust to the most user-friendly option as more field input is received.

4. Non-Duplication

AmeriCorps has taken several steps to ensure that this information is not collected elsewhere and that it could not be otherwise obtained. First, AmeriCorps reviewed existing data collection in its current data collection efforts and determined that this data is not currently being collected from prospective grantees. We do not have existing data collection mechanisms for prospective grantees to report this information. Second, AmeriCorps reviewed existing data sets and determined it could not obtain the comprehensive information from these sources. In particular, AmeriCorps evaluated the U.S. Census poverty data for the counties in which AmeriCorps participants serve. This data is not specific to the projects and could therefore easily under-represent or over-represent the percentage of project beneficiaries who are people in poverty. The same issues would arise with regard to U.S. Census demographic data on any given racial or ethnic identification or gender.

5. Minimizing Burdens on Small Businesses

AmeriCorps works with very few small businesses, and does not believe that exemptions, alternate options, or partial or delayed compliance options are needed. AmeriCorps has adjusted both the questionnaire and instructions for all respondents in response to comments received on the AmeriCorps State and National-specific diversity questionnaire currently in use to improve clarity.

6. Less Frequent Collection

In terms of frequency, AmeriCorps will request that the Diversity Questionnaire Form be filled by every current grantee and applicant for funding and resource allocation when they are submitting their request. If awarded a resource, AmeriCorps proposes to track this information across the cycle of the grantee's engagement with AmeriCorps by including total beneficiaries reached, disaggregated by poverty status, in the Progress Report Supplements for VISTA and AmeriCorps Seniors, the Annual Grantee Progress Report for AmeriCorps State and National, and the Project Completion report for NCCC. AmeriCorps may also request the questionnaire to be included with grant renewal and new applications on an annual basis. This frequency is appropriate and necessary because when the grantees are first filling in the questionnaire, they are providing their projections of who will be served, and the annual updates allow them to adjust their estimates based on actual information they may have at that point. With regard to the diversity of composition of AmeriCorps partners, the frequency allows them to update the information to reflect any changes in leadership and staff.

There currently no consequences to AmeriCorps program or policy if the collection is not conducted or is conducted less frequently than proposed. However, the data on poverty will figure into funding decisions, as AmeriCorps is committed to ensuring resources are invested in support of underserved communities, and therefore, each organization's proposed reach for individuals and communities facing poverty will be considered in allocation of resources.

7. Paperwork Reduction Act Guidelines

This collection does not involve any special circumstances that would require respondents to submit multiple copies of the document, retain records, or be conducted in any other of the listed manners. This information collection follows the OMB statistical data classification for race and ethnicity set out in [Statistical Policy Directive No. 15, Race and Ethnic Standards for Federal Statistics and Administrative Reporting](#).

8. Consultation and Public Comments

AmeriCorps published a 60-day Notice requesting public comment on January 13, 2022 at 87 FR 2145. AmeriCorps received 20 comments in response to the required Federal Register request for comment (plus one additional comment that was not responsive).

AmeriCorps has addressed them to the fullest extent possible in the 60-day notice for this revised information collection request. Most of the comments focused on the purpose of the data collection, the ability or organizational capacity of partners to collect the requested data, the design of the data collection tool, the format of the tool, the usage of the data, the assessment of burden, and training and technical assistance. Responses to these comments are summarized here:

- In terms of purpose, there was significant praise and support for AmeriCorps' efforts to advance diversity and inclusion in our programs and to advance justice and equity in our communities.

- In terms of comments related to ability or organizational capacity of partners to collect the requested data, AmeriCorps understands that for some, the requested data may not be collected currently and it may take time to develop the systems to collect this data. Therefore, AmeriCorps has clarified that it will accept proposed data in the tool, during the application or concept note stage, for the reach of the project. It notes that should the organization be successful, it will need to report on actuals in the Progress Report Supplements for VISTA and AmeriCorps Seniors, the Annual Grantee Progress Report for AmeriCorps State and National, and the Project Completion report for NCCC. AmeriCorps also expects this questionnaire to be included with grant renewal and new applications on an annual basis, and will anticipate improvements in data quality over time. As part of the strategic plan, AmeriCorps will explore barriers to engagement with new and diverse organizations.
- In terms of comments related to the design of the data collection tool, AmeriCorps has made a number of improvements. First, AmeriCorps has separated the requested data into sections: project information and organizational information. Second, AmeriCorps has improved its definitions and instructions to be clearer. Third, AmeriCorps has improved instructions to be clearer on how this data will feed into the lifecycle of the grant/award, if the organization is successful in securing funding. Finally, AmeriCorps has not changed its demographic categories, but previously revised the diversity questions to better align with U.S. Census terminology and has revised definitions accordingly.
- In terms of comments related to the usage of the data, AmeriCorps has clarified how the data will be used in the instructions. For proposed beneficiaries, the poverty data will be taken into account in grantmaking and resource allocation decisions to better reach those who are underserved. The demographic data will not factor into grantmaking and resource allocation decisions, but as AmeriCorps has never collected demographic data of beneficiaries in the past, the agency has no baseline for who is reached by its resources in terms of demographics. This will give AmeriCorps a deeper understanding of who is being served by AmeriCorps programs to inform future work. For demographic data about staff, leadership and Board members of the organization applying for an AmeriCorps resource, it will enable AmeriCorps to better target training, technical assistance, and outreach to grantees and sponsors, in particular those who are new to AmeriCorps. This information will not be included in grantmaking and resource allocation decisions.
- In terms of comments related the format of the tool, AmeriCorps is testing different ways to collect the data – via MS Excel, Survey Monkey, and Qualtrics (planning phase) - and will continue to improve in terms of the technology it will use to collect the data.
- For comments related to the assessment of burden for information collection, AmeriCorps, AmeriCorps made a change to the estimated time burden, from 30 minutes to 5 hours to take into consideration the estimation of time that it will take to fill out the questionnaire as well as the time it will take an organization to collect and analyze the data, which was not previously included.
- In terms of comments related to AmeriCorps’ training and technical assistance, and requests for more support, AmeriCorps will consider how to best provide this support, and anticipates providing guidance and training on demographic data collection.

Prior to the 60-day Notice, AmeriCorps published an emergency 30-day Notice requesting public comment in the Federal Register on August 24, 2021 at 86 FR 47301. That comment period ended September 24, 2021. Twelve public comments were received on this Notice. AmeriCorps received 12 public comments during that period and addressed them to the fullest extent possible in the 60-day notice for this revised information collection request.

Most of the comments focused on the data collection approach and tool, timeline for the data collection, usage of the data, safeguarding of data, assessment of burden, and organizational capacity to complete the tool. Responses to these comments are summarized here:

- For comments related to revisions of the collection approach and updates to the tool, AmeriCorps revised the diversity questions to better align with U.S. Census terminology and has revised definitions accordingly.
- For comments related to revisions to the collection timeline, AmeriCorps did not make a change, as it aims to create a baseline through this first data collection and therefore the most comprehensive and efficient time to collect is during the application process.
- In terms of questions related to data usage, AmeriCorps refined the sections of the tool on purpose and usage of data for clarity.
- In terms of questions related to safeguarding, AmeriCorps updated language in the tool to confirm that it will be collecting data in the aggregate. The information requested does not include any types of personally identifiable information, and other than lawfully authorized requests, the information will not otherwise be disclosed to entities outside of AmeriCorps.
- For comments related to the assessment of burden for information collection, AmeriCorps estimated that the burden of entering existing demographic data into the Diversity Questionnaire data collection tool is correctly estimated to be 30 minutes and did not warrant a revision.
- Finally, for comments related to organizational capacity, AmeriCorps believes that all organizations have the capacity to fill out the tool in a timely and responsive manner; instructions in the tool were updated to say that organizations should complete the form to the “best of their ability.”

With submission of this Supporting Statement, AmeriCorps is also publishing a 30-day Notice in the Federal Register for additional public comment. *See* 87 FR 18773 (March 31, 2022).

9. Gifts or Payments

The agency is not proposing to provide any incentive (monetary or non-monetary) to potential respondents to obtain their information or to encourage respondents to provide the requested information.

10. Privacy and Confidentiality.

AmeriCorps is not providing any assurance of confidentiality as part of the Diversity Questionnaire. Nor does the Diversity Questionnaire request any personally identifiable information.

11. Sensitive Questions

The Diversity Questionnaire asks questions regarding the income level of persons served and asks questions regarding LGBTQIA+ identification and disabilities of both the persons served and persons in the organization’s leadership and on staff. These questions could be considered sensitive, but AmeriCorps believes the questions are necessary in order to understand the full diversity of people served by AmeriCorps resources and its partners.

The Diversity Questionnaire includes both “Prefer Not to Answer” and “Not Reported” in all demographic questions. The information is voluntary, and not mandatory, and there are currently no consequences for not submitting this demographic information.

12. Burden Estimate

The total number of respondents is 3,350, which includes the following number of respondents in each program:

- o AmeriCorps State & National: 750
- o VISTA: 850
- o NCCC: 550
- o AmeriCorps Seniors: 1,200

Respondents vary in size and capacity, but AmeriCorps estimates that, on average, it will take each respondent approximately 4 hours to collect the requested information and 1 hour to review the instructions and fill in the Questionnaire. The estimated respondent burdens and labor costs are shown in the following table.

Estimation of Respondent Burden	
Number of respondents	3,350
Responses per respondent (annually)	1
Number of responses	3,350
Hours per response	5
Total estimated hours (number of responses multiplied by hours per response)	16,750
Cost per hour (hourly wage)	\$45.14
Annual public burden (estimated hours multiplied by cost per hour)	\$756,095

Note: The cost per hour is based on the average of eight 2021 OPM GS hourly rates (base + locality) for a GS-11, step 1 employee living in our eight regions of operation, plus the 36.25% civilian personnel full fringe benefit rate from OMB memorandum M-08-13. The average cost per hour is \$33.13 (average hourly rate) + \$12.01 (\$33.13 average hourly rate x 36.25% fringe) = \$45.14/hour (rounded to the nearest penny).

The 2021 GS-11, step 1 hourly rates for the eight regions of operation are as follows: Austin, TX (\$31.57), Atlanta, GA (\$32.64), Columbus, OH (\$32.06), Concord, NH (\$34.49), Denver, CO (\$33.96), Kansas City, MO (\$31.29),

Los Angeles, CA (\$35.37) and Philadelphia, PA (\$33.67). The average hourly rate is the sum of these hourly rates divided by eight = \$33.13/hour (rounded to the nearest penny).

Annual Responses and Burden with Changes:

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses for this IC	3,350	N/A	2,600	N/A	N/A	750
Annual IC Time Burden (Hour)	16,750	N/A	13,000	3,375	N/A	375
Annual IC Cost Burden (Dollars)	0	N/A	N/A	-16,928	N/A	16,928

The total number of responses requested increased to account for the responses for the VISTA, NCCC, and AmeriCorps Seniors programs, in addition to the previously approved responses for the AmeriCorps State and National program.

The hourly burden requested increased to account for hours associated with the new responses for the VISTA, NCCC, and AmeriCorps Seniors programs, and to account for the adjustment in hourly burden estimate from 0.5 hours to 5 hours:

- The hourly burden increase is due to the agency discretion (adding the 3 programs) totals 13,000 because there are 2,600 new respondents whose responses are estimated to take 5 hours each.
- The change due to agency discretion is due to the increase in estimated hourly burden per response from 0.5 hours to 5 hours per response, so that the previously approved 750 responses will now total 3,750 hours, which is an increase of 3,375 hours over the previously approved 375 hours.

The annual IC cost burden is reduced because the 16,928 represented the salary/hourly cost burden, rather than the non-hour cost burden, which is \$0.

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	5 Hours	5	0
Record Keeping	0	0	0
Third Party Disclosure	0	0	0

Total	5 Hours	5	0
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Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	16,750	0
Record Keeping	0	0
Third Party Disclosure	0	0
Total	16,750	0

13. Estimated Nonrecurring Costs.

This information collection does not impose any annual cost burden on respondents, as the respondents are applicants and grantees who will already have mechanisms in place to track who they serve and who are on staff and in leadership positions at their organization. No capital and start-up costs are expected.

14. Estimated Cost to the Government

The annual cost of this Diversity Questionnaire to AmeriCorps is \$103,824. This annual cost is salary expense for the AmeriCorps staff who assist applicants/grantees with guidance and training on the Diversity Questionnaire and who assist in compiling the responses. We estimate that approximately 42 staff (across Programs, Office of Regional Operations, Chief of Program Operations and Chief Data Officer) will assist with these efforts. We are using an average GS-12 salary, Step 10 (similar to average of NY-4/NY-3) at \$49.44/hour, and average of 50 hours/staff member.

The federal government employee salary information was obtained from OPM’s 2022 Salary Table for the Rest of the U.S. (RUS) at

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/RUS_h.pdf and includes a 1.5 multiplier to account for the costs of benefits.

15. Reasons for Changes

AmeriCorps made program changes to expand the scope of respondents to include not only organizations seeking AmeriCorps State and National resources, but also applicants and grantees of the VISTA, NCCC, and AmeriCorps Seniors programs, in order to obtain this information across the agencies’ programs. In response to public comment, AmeriCorps also made changes to the estimates for how long it takes respondents to fulfill the information collection to account for both the time it takes to actually fill in the form and the time it takes to collect the information needed to fill in the form. These changes resulted in an increase in responses of 2,600 and an increase in burden hours of 16,375.

16. Publicizing Results

Generally, the data will be collected throughout the calendar year through calls for concept papers, grant competitions and other methods for engaging with AmeriCorps grantees and sponsors. Each AmeriCorps program has a different timeline for collection and tabulation: VISTA is quarterly, NCCC is ongoing, AmeriCorps Seniors is bi-annually and AmeriCorps State and National is ongoing.

Once the data has been collected through Progress and Completion reports, tabulated and analyzed, AmeriCorps will plan to publish information against the Performance Goal in the Strategic Plan that 40% of all those served by AmeriCorps members and AmeriCorps Seniors volunteers are people in poverty. AmeriCorps uses people in poverty as its measure for “underserved”. The anticipated publication date will be in 2024. This information could also be used to support the agency’s Justice40 reporting and other initiatives.

17. OMB Not to Display Approval

AmeriCorps will display the expiration date of OMB’s approval.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

There are no exceptions because this information collection:

- Is necessary for the proper performance of agency functions;
- Avoids necessary duplication;
- Reduces burden on small entities;
- Uses plain, coherent, and unambiguous language that is understandable to respondents;
- Will be implemented consistent and compatible with current reporting and recordkeeping practices;
- Indicates the retention periods for recordkeeping requirements;
- Informs respondents of the information called for under 5 CFR 1320.8(b)(3) about:
 - Why the information is being collected;
 - Use of the information;
 - Burden estimate;
 - Nature of response (voluntary, required for benefit, or mandatory);
 - Nature and extent of confidentiality; and
 - Need to display current valid OMB control number;
- Was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected;
- Uses effective and efficient statistical survey methodology (if applicable); and
- Makes appropriate use of information technology.

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods

This request does not include surveys or censuses and does not use statistical methods.

