
SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

A. Justification

A1. Need for Information Collection

The Corporation for National and Community Service (AmeriCorps) dba AmeriCorps 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 AmeriCorps Seniors programs. This information collection comprises the Application Package for AmeriCorps Seniors grantees, Progress Reporting, and Independent Living and Respite Surveys.

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

Applicants respond to the questions included in these instructions in order to apply for AmeriCorps Seniors funding and to report out on performance of their project. AmeriCorps Seniors will use the information collection to select grantmaking entities that will identify, support and evaluate nonprofit organizations to implement and scale evidence-based solutions to community challenges.

There is no travel time associated with developing or submitting these documents, nor is their time waiting to speak with agency personnel. Cognitive load, discomfort, and stress is similar to other federal applications. While new questions are being proposed for the annual Progress Report Supplement, AmeriCorps Seniors is also planning to reduce the number of questions, potentially leading to increased institutional trust as AmeriCorps is committed to only asking information from grantees and applicants that is determined is needed. There will be some time needed to determine how to collect new information as being proposed in the Progress Report Supplement.

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

AmeriCorps will be eliciting and accepting applicants' response to these questions electronically via eGrants the AmeriCorps' secure online grants management system. If applicants are unable to apply or report on-line, they can use the attached forms and instructions to submit their application.

A4. Non-Duplication

There are no other sources of information by which AmeriCorps 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 assess an organization's eligibility to apply to administer a Social Innovation Fund grant and only information required to assess a grantee's annual performance.

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

AmeriCorps will be unable to request the necessary information to assess prospective AmeriCorps Seniors grantees, nor able to assess the performance of AmeriCorps Seniors grants.

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 April 27, 2023, on Vol. 88, FR 25625. 32 comments were received. AmeriCorps Seniors proactively reached out to AmeriCorps' Office of Research and Evaluation who, in conjunction with AmeriCorps Seniors, to identify reporting questions that allow AmeriCorps Seniors to report out on key metrics in as minimally burdensome process as possible. Additionally, AmeriCorps Seniors reached out the board members of the AmeriCorps Seniors Associations – representatives of AmeriCorps Seniors grantees with proposed changes to the Progress Report Supplement, the only document proposed being changed. The Associations were appreciative of efforts by AmeriCorps to reduce the overall number of questions in the annual report. They provided feedback that guidance would need to be updated and they would need time to implement data collection mechanisms to report out on new questions. AmeriCorps agreed that time may be needed to implement data collection mechanisms for new reporting questions and, thus, would not make them required for the first year implemented.

There were 32 total comments. Of these, 26 were the same comment. Of the other comments, one was in support, one was without specific comment, and the others detailing that the Progress Report Supplement (PRS) is a burden. In relation to the Progress Report Supplement (PRS), the only document with proposes revisions, AmeriCorps Seniors agrees that reporting may be burdensome and is thus reducing the overall number of questions required within the Progress Report Supplement.

Comment: AmeriCorps Seniors grants are awarded for a three-year period with required annual budget submissions. ASPN questions the value and additional time needed to update the grant application and workplan submission annually. With a three-year performance period, ASPN proposes for a grantee to submit an annual budget application and an executive summary to update amended community needs and changes instead of the entire grant application. This change would not only reduce the time needed of grantee staff, but also regional staff grant reviewers.

AmeriCorps Response: AmeriCorps is in the process of modernizing our grant management systems. As part of the modernization effort, AmeriCorps will propose grantees to submit a simplified budget application and an update through a simplified amendment process rather than an entire grant continuation application.

Comment: While the Progress Report at the end of a grant year is straightforward, there is confusion as to how much information is needed in the narrative section. Instructions about the examples of info that is most helpful in the narrative sections would be welcome.

AmeriCorps Response: In addition to Progress Report Instructions and training, AmeriCorps provides Appendix A.4 – AmeriCorps Seniors Progress Report Tips in each Program Handbook. This document shares examples about what information is worth considering for the narrative sections of the Progress Report. In addition, grantees can also speak with their Portfolio Manager about what information and to what extent they should include.

Comment: The Progress Report Supplement has been referred to as many different things over the years. With current Performance Measure workplans being very specific as to the special needs served by volunteers, this complete demographic report is burdensome for both program and station staff. ASPN has been told that there is no way for CNCS to aggregate the data reported into a national needs snapshot. As such, ASPN strongly believes that is CNCS unable to aggregate this data, programs should not be asked to collect it. The current reporting dates do not take into account grant years; therefore, programs are reporting on portions of two different grant years, causing the information to often be incorrect. Demographics of the volunteers should be rolled into the annual Progress Report. The PPR-S should be eliminated and would reduce the administrative burden for both grantees and agency staff.

AmeriCorps Response: AmeriCorps can and does aggregate the demographic section of the Progress Report Supplement (PRS). At this time, AmeriCorps is in the process of updating their grant management systems to enable volunteer information to be able to be entered directly into the system. AmeriCorps Seniors anticipates that this will eliminate the need for the Progress Report Supplement, reducing the administrative burden for

grantees and agency staff.

Comment: Independent Living and Respite Surveys: SCP directors report that national work-plans do not require all the information requested on these surveys. If the workplan does not request the information, it would be best if those questions were eliminated from the survey and would possibly result in a better return on the number of clients completing the surveys. As Senior Companions serve those with dementia, it is often the caregiver of the client that completes this survey. In an effort to mitigate adding to caregiver burden, a shortened survey could be more easily completed which would then in turn, produce a better response rate.

AmeriCorps Response: At only 13 questions, AmeriCorps Seniors disagrees that this survey is too burdensome. However, AmeriCorps Seniors will review the Independent Living and Respite Survey. AmeriCorps Seniors is interested in the specific questions which SCP Directors propose to be eliminated.

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

We expect approximately 1250 respondents to apply via the enrollment form and/or complete the annual survey. The frequency of response will not be greater than annually and should not exceed one hour of effort per respondent. There is no estimated annual hour burden outside of the customary and usual business practices.

A13. Cost burden to the respondent

The estimated respondent burdens and labor costs are shown in the following table.

Estimation of Respondent Burden	
Number of respondents	1250
Responses per respondent	5

Number of responses	6250
Hours per response	1
Total estimated hours (number of responses multiplied by hours per response)	6250
Cost per hour (hourly wage)	\$45.14
Annual public burden (estimated hours multiplied by cost per hour)	\$282,125.00

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).

A14. Cost to Government

The estimated cost to the Government is shown in the following table. It is estimated that it will take the Government 1 hour to review and verify the information contained in each response. This estimate was developed by staff involved in the management of current activity.

Estimation of Cost to the Government	
Number of responses	3750
Hours per response	1
Total estimated hours (number of responses multiplied by hours per response)	3750
Cost per hour (hourly wage)	\$45.14
Annual burden (estimated hours multiplied by cost per hour)	\$169,275

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).

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

Adjustments in burden and cost were determined after meeting with AmeriCorps Staff and AmeriCorps Seniors grantees.

A16. Publication of results

Some results of this grant competition and progress reporting will be published on the AmeriCorps website for the purpose of transparency in federal grantmaking.

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.