Corporation for National and Community Service (AmeriCorps)

**AmeriCorps Application Questions**

**OMB Control Number 3045-0187**

Justification – Part A Supporting Statement

Overview of Information Collection:

This is a request for extension of a currently approved information collection for the application questions that applicants must respond to apply for Corporation for National and Community Service (AmeriCorps) grant funding when appropriations are available. No changes to the form, method of collection, respondent or hour burden estimates have been made since the prior approval. An adjustment to the cost burden estimate was made to account for respondents’ hourly burden, as this information was not captured in the prior approval.

1. Need & Method for the Information Collection.

AmeriCorps awards grants to states, institutions of higher education, non-profit organizations, Indian Tribes, and U.S. Territories to operate AmeriCorps State and National, AmeriCorps NCCC, AmeriCorps VISTA, and AmeriCorps Seniors programs. AmeriCorps is authorized to provide grants through these programs by the National and Community Service Act of 1990, as amended, 42 U.S.C. 12501 *et seq.* and the Domestic Volunteer Services Act of 1973, as amended, 42 U.S.C. 4950 *et seq,* and is authorized to require applications for assistance specifically under 42 U.S.C. § 12582.The statutes do not impose any deadline, but the notices of funding opportunity for each grant program establish an application deadline. The grant application information is collected online via the eGrants system, the grants management system AmeriCorps currently uses. If this information is not collected or is collected less frequently, then AmeriCorps will be unable to provide funding under its grant programs.

1. Use of the Information.

AmeriCorps reviews the information provided on the application to identify which entities are in need of the financial assistance provided through these programs and evaluate their project design, organizational capacity, and other pertinent information.

* Prospective AmeriCorps grantees research Notice of Funding Opportunities (NOFO) published by AmeriCorps on the AmeriCorps website. Applicants decide what type of funding opportunity fits best with their program goals and reads through the NOFO and application instructions to gather the required information request in the collection.
* Completing this collection entails a fair amount of time and effort burden, including psychological burden. As described in response to Question 8, below, on September 12, 2023, AmeriCorps led a focus group with 9 individuals to discuss the burden of the AmeriCorps Application Questions. The participants in the focus group were a mix of VISTA sponsors, and grantees from AmeriCorps Seniors, AmeriCorps State and National, and Volunteer Initiatives. Participants agreed that AmeriCorps requests a lot of data in its application and described the learning costs in obtaining familiarity with the system; while changes to address these learning costs are not currently possible in eGrants, these comments will help inform improvements to the forthcoming grants management system.
* A new grants management system is forthcoming for AmeriCorps, and the hope is that many of the burdensome issues caused by the system itself will be resolved. Currently, no changes can be made to eGrants.
1. Use of Information Technology.

This information collection is conducted online using the web-based grants management system, eGrants.

1. Non-duplication.

There are no other sources of information available that would allow AmeriCorps to meet the purposes described in 2 (above).

1. Burden on Small Business.

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 and capacity to administer a grant.

1. Less Frequent Collection.

If this collection were not conducted or was conducted less frequently, AmeriCorps would be unable to assess prospective grantees.

1. Paperwork Reduction Act Guidelines.

There are no special circumstances that would require collection of information in these ways.

1. Consultation and Public Comments.

AmeriCorps published a 60-day notice requesting public comment on renewal of this information on July 31, 2023 (88 Fed. Reg. 49453). No comments were received in response to that notice. On October 30, 2023, AmeriCorps published the 30-day notice (88 Fed. Reg. 74156). In the interim, on September 12, 2023, AmeriCorps led a focus group with 9 individuals to discuss the burden of the AmeriCorps Application Questions. The participants in the focus group were a mix of VISTA sponsors, and grantees from AmeriCorps Seniors, AmeriCorps State and National, an Volunteer Initiatives. Participants believed the estimated hour burden was far below the amount of time it takes to complete the application, stating that it can take several weeks to complete. AmeriCorps has adjusted the hourly cost burden estimate as described below in response to this comment.

Participants also had several suggestions that, though not currently possible in eGrants, will help inform improvements to the forthcoming grants management system. These include suggestions that AmeriCorps: better explain in the NOFO why it requires the level of data collection it requests; consolidate the application materials (NOFO, guidance, application instructions) to eliminate circular references; replacing eGrants; providing a word limit section rather than a page limit, and providing clear checklists of “must-do” items and criteria to help guide applicants through the process in a more concrete way. While many of these changes are not currently possible in eGrants, these comments will help inform improvements to the forthcoming grants management system.

1. Gifts or Payment.

There are no payments or gifts to respondents.

1. Privacy & Confidentiality.

No assurance of confidentiality is provided to respondents for this information collection and no confidential or personally identifiable information is collected.

1. Sensitive Questions.

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

1. Burden Estimate.

We estimate that approximately 13,200 respondents use these instructions to apply for AmeriCorps grants and for it to take approximately 40 hours of effort, on average for each respondent. The frequency of response depends upon the availability of appropriations. There have been no changes to the respondent estimates since the last approval, but the hour burden estimate has been increased from 6 to 40 hours based on consultation input and the cost information has been added to account for the cost of respondents’ time to respond to the information collection.

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|  | **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 | 13,200 | 0 | 0 | 0 | 0 | 13,200 |
| Annual IC Time Burden (Hour) | 528,000 | 0 | 0 | 448,800 | 0 | 79,200 |
| Annual IC Cost Burden (Dollars) | 23,818,080 | 0 | 0 | 23,818,080 | 0 | 0 |

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| Burden per Response:

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| --- | --- | --- | --- |
|  | **Time Per Response**  | **Hours**  | **Cost Per Response**  |
| Reporting  | 40 hours | 40 | $1,804.40 |
| Record Keeping  |  |  |  |
| Third Party Disclosure  |  |  |  |
| Total  |    | 40 | $1,804.40 |

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| Annual Burden:

|  |  |  |
| --- | --- | --- |
|  | **Annual Time Burden (Hours)**  | **Annual Cost Burden****(Dollars)**  |
| Reporting  | 528,000 | $23,818,0880 |
| Record Keeping  |  |   |
| Third Party Disclosure  |  |   |
| Total  | 528,000 | $23,818,0880 |

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The cost per hour is based on the Office of Personnel Management (OPM) General Schedule (GS) hourly rate of $33.11 for a GS-11, step 1, employee ([Salary Table 2023-RUS](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS_h.pdf) for calendar year 2023 for the rest of the U.S.) plus the 36.25% civilian personnel full fringe benefit rate from [OMB memorandum M-08-13](https://www.whitehouse.gov/omb/information-for-agencies/memoranda/#memoranda-2024) ($33.11 + $12.00 = $45.11, rounded to the nearest dollar). This corresponds to the median hourly rate of the respondents. The cost per response and total cost burden have been added above as adjustments to the agency estimates because the prior approval did not capture these costs.

1. Estimated nonrecurring costs.

No total capital and start-up costs, operation and maintenance costs, or purchase of services beyond customary and usual operating costs are required by this information collection.

1. Estimated cost to the Government.

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

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| --- |
| Estimation of Cost to the Government |
| Number of responses | 13,200 |
| Hours per response | 1 |
| Total estimated hours (number of responses multiplied by hours per response) | 13,200 |
| Cost per hour (hourly wage) | $49.49 |
| Annual burden (estimated hours multiplied by cost per hour) | $653,268 (rounded) |

**Note:** The cost per hour is based on the average of eight 2023 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 $36.32 (average hourly rate) + $13.17($36.32 average hourly rate x 36.25% fringe) = $49.49/hour (rounded to the nearest penny).

The 2023 GS-11, step 1 hourly rates for the eight regions of operation are as follows: Austin, TX ($33.94), Atlanta, GA ($39.97), Columbus, OH ($34.47), Concord, NH ($37.25), Denver, CO ($36.68), Kansas City, MO ($33.59), Los Angeles, CA ($38.34) and Philadelphia, PA ($36.34). The average hourly rate is the sum of these hourly rates divided by eight = $36.32/hour (rounded to the nearest penny). *See* <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/general-schedule/>.

1. Reasons for changes.

AmeriCorps adjusted the hour burden estimate, increasing it from 6 to 40 hours, based on consultation input and added the cost information to account for the cost of respondents’ time to respond to the information collection.

1. Publicizing Results.

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

1. OMB Not to Display Approval.

Not applicable.

1. Exceptions to "Certification for Paperwork Reduction Submissions."

No exceptions are being requested.

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

Not applicable.