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Ed Award Information Collections

Comment On: CNCS-2026-0001-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Segal Education Award

Document: CNCS-2026-0001-DRAFT-0004
Comment from SUBMITTED FOR OMB OIRA AND OIG REVIEW ON MARCH 16, 2026 BY OBELISK TECH SYSTEMS INC.

Submitter Information

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Organization: SUBMITTED FOR OMB OIRA AND OIG REVIEW ON MARCH 16, 2026 BY OBELISK TECH SYSTEMS INC.

General Comment

CNCS-2026-0001 | OMB 3045-0014, 3045-0030, 3045-0053 | James Hunter Poole, CEO, Obelisk Tech Systems | CAGE: 9S0L8 | HUBZone | ITAR-Registered | Thomasville, Thomas County, Georgia
Three separate OMB collections for one integrated program function — all expiring simultaneously — confirms these should be consolidated into one unified Segal Award management collection. **BURDEN:** Voucher 5 min + Forbearance 10 min estimates exclude first-time user account lookup (adds 10–20 min), servicer coordination time, failed submission resubmission cycles, and multiple submissions per service term. **METHODOLOGY:** No pilot study or usability validation data disclosed for any of the three estimates. **DUPLICATION:** NSLDS and Federal Student Aid already hold member loan servicer, account, and balance data — AmeriCorps has not established data-sharing agreements to pre-populate Voucher forms from existing federal student loan records. PRA prohibits collecting information already available through existing federal systems. **TECHNOLOGY FAILURE:** MyAmeriCorps portal exists but has no API integration with NSLDS, FSA, or loan servicer systems — a digital-native member population forced through a fragmented multi-form, multi-portal, multi-servicer manual workflow. 21st Century Cures Act FHIR mandates and Higher Education Act data-sharing authorities provide the legal framework for integration that AmeriCorps has not pursued. **COST REALITY:** Loan servicer processing costs for 34,385 annual Voucher transactions entirely excluded. **OIRA REFERRAL:** AmeriCorps Segal Award fragmentation is part of a broader federal student benefit program interoperability failure spanning ED, AmeriCorps, and other agencies — OIRA cross-agency review recommended. **RECORDKEEPING:** Member and servicer documentation maintenance obligations excluded from all three estimates in violation of 44 U.S.C. 3502(2). Five comment documents attached covering all 20 PRA attack vectors.

Attachments

CNCS_C1_Burden_Lifecycle

CNCS_C2_Methodology_Cost_Economic

CNCS_C3_Utility_Duplication_Statutory

CNCS_C4_Technology_Interop_COTS

CNCS_C5_SmallBiz_Security_Quality_Records

CNCS-2026-0001 | Comment 1 of 5 — Burden Hours & Lifecycle

Docket No.: CNCS-2026-0001

Re: Segal Education Award — Voucher/Payment Form (OMB 3045-0014), Forbearance Request Form (OMB 3045-0030), Interest Accrual Form (OMB 3045-0053)

Agency: Corporation for National and Community Service (AmeriCorps)

Submitted: March 16, 2026

Submitted by:

James Hunter Poole, Executive Chairman & CEO, Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | HUBZone-Certified Small Business | ITAR-Registered

CMMC Level 2 | BIS SNAP-R CIN: S745686 | Thomasville, Thomas County, Georgia

14-Patent Portfolio: Cybersecurity, Quantum Communications, Autonomous Systems

Obelisk Tech Systems Inc. submits these comments as a HUBZone-certified small defense technology business whose employees and contractors may participate in or have participated in AmeriCorps national service programs, and as an employer and community stakeholder in Thomas County, Georgia with direct interest in the regulatory burden imposed on national service alumni managing student loan obligations. These comments address substantive deficiencies across all three Segal Education Award information collections.

I. Burden Hours — Three Separate Collections With Compounding Understatement

AmeriCorps is renewing three separate information collections tied to the Segal Education Award program. The stated burden estimates are: Voucher and Payment Request Form (OMB 3045-0014): 5 minutes per response x 34,385 annual responses = 2,865 hours. Forbearance Request Form (OMB 3045-0030): 10 minutes per response x 13,182 annual responses = 2,197 hours. Interest Accrual Form (OMB 3045-0053): 5 minutes per response x 320 annual responses = 27 hours. Total stated burden: 5,089 hours across three collections. These estimates are understated for the following reasons:

- Voucher/Payment Form: 5-minute estimate assumes the member already knows their loan servicer information, award account balance, and eligible institution details. For members using the form for the first time, account lookup, servicer identification, and institutional eligibility verification add 10–20 minutes. True first-use burden: 15–25 minutes
- Forbearance Request Form: 10-minute estimate excludes the time required to contact loan servicers to confirm forbearance eligibility, obtain current loan balance information, and coordinate between AmeriCorps MyAmeriCorps portal and servicer-specific forbearance request systems
- Interest Accrual Form: 5-minute estimate excludes the time required to calculate accrued interest amounts, coordinate with loan servicers on current interest accrual figures, and obtain institutional verification for eligibility
- None of the three burden estimates account for failed submissions requiring resubmission due to system errors, incorrect information, or processing rejections

II. Lifecycle Burden — Multiple Forms Per Member Per Service Term

The Forbearance Request Form notice states "Frequency: One or more per education award" — acknowledging that members may submit multiple forbearance requests across a single service term. A member serving a full-year AmeriCorps term who requests forbearance at enrollment, mid-term, and term completion submits three separate forbearance forms. The 10-minute estimate

applied to 13,182 responses understates the per-member annual burden by a factor of up to 3 for members submitting multiple forbearance requests. Additionally, members using the Voucher form for multiple loan servicers or multiple semesters submit multiple voucher forms within a single award period — each generating a separate 5-minute (understated) burden event.

Requested: AmeriCorps must produce per-member annual burden estimates accounting for multiple form submissions per service term; disaggregate first-time vs. repeat user burden for Voucher form; disclose error and resubmission rates.

CNCS-2026-0001 | Comment 2 of 5 — Methodology, Cost & Economic Impact

Docket No.: CNCS-2026-0001

Re: Segal Education Award — Voucher/Payment Form (OMB 3045-0014), Forbearance Request Form (OMB 3045-0030), Interest Accrual Form (OMB 3045-0053)

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III. Methodology Flaws — No Pilot Validation Disclosed

AmeriCorps does not disclose whether any of the three burden estimates are based on actual member time-tracking data, usability studies, or pilot testing. The 5-minute Voucher form estimate and 10-minute Forbearance form estimate appear to reflect theoretical form completion time rather than empirically observed member experience. Given that many AmeriCorps members are young adults completing federal loan management forms for the first time, the theoretical completion time substantially understates actual burden. AmeriCorps should conduct a structured usability study with representative members — including first-time users, non-native English speakers, and members with multiple loan servicers — before OMB approves these renewals.

- No pilot study data, time-tracking data, or usability validation disclosed for any of the three burden estimates
- Member demographic diversity (age, education level, language proficiency, prior loan management experience) creates wide variance not captured in single average estimates
- OMB should require AmeriCorps to conduct a representative member usability study before renewal

IV. Cost Reality — Member Financial Costs Excluded

"No direct costs to respondents other than their time" understates member burden in several ways. Members submitting the Voucher form for student loan payments must obtain documentation from loan servicers that may charge administrative fees for certain servicer-specific documentation requests. Members navigating the Interest Accrual form must coordinate with both AmeriCorps National Service Trust and their loan servicer — interactions that may require members to take time away from their AmeriCorps service activities, creating indirect costs to their service programs. For members at rural service sites with limited internet access, digital form submission may require travel to connectivity resources.

V. Economic Impact at Scale — Student Loan Servicer Burden Excluded

The Voucher and Payment Request form requires businesses (student loan servicers) to verify eligibility information. AmeriCorps reports 34,385 annual voucher responses involving both members and servicers. Loan servicers processing AmeriCorps Segal Award vouchers must: verify loan eligibility, confirm payment application instructions, process payments outside their normal servicer workflow, and in some cases modify servicer system records. The servicer-side processing burden for 34,385 annual voucher transactions — entirely excluded from AmeriCorps's "no cost" claim — represents real financial services industry costs.

Requested: AmeriCorps must conduct member usability study; include servicer-side processing cost estimates; disclose form error and rejection rates with resubmission burden.

CNCS-2026-0001 | Comment 3 of 5 — Practical Utility, Duplication & Statutory Authority

Docket No.: CNCS-2026-0001

Re: Segal Education Award — Voucher/Payment Form (OMB 3045-0014), Forbearance Request Form (OMB 3045-0030), Interest Accrual Form (OMB 3045-0053)

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VI. Practical Utility — Three Separate Forms for One Program Function

The Segal Education Award program requires three separate information collections — Voucher/Payment, Forbearance, and Interest Accrual — each with separate OMB control numbers, separate expiration dates (all expiring March 31, 2026), and separate renewal notices. These three collections serve a single integrated program function: managing AmeriCorps member education award usage. A member managing their Segal Award across loan payment, forbearance, and interest accrual must navigate three separate form processes with potentially different submission channels, processing timelines, and servicer interaction requirements. AmeriCorps has not demonstrated why these three functions cannot be consolidated into a single integrated Segal Award management form with unified OMB coverage.

- Three separate OMB control numbers for one integrated education award management function multiplies administrative overhead without demonstrated utility benefit
- Simultaneous expiration of all three collections suggests they were developed together and should be renewed together as a unified collection
- A single integrated Segal Award management portal would reduce member burden and improve program administration

VII. Duplication — Federal Student Aid and NSLDS Data Overlap

The Voucher and Payment form requires members and servicers to provide loan account information — loan servicer identity, account numbers, eligible institution confirmation — that is already held in the Department of Education's National Student Loan Data System (NSLDS) and Federal Student Aid (FSA) systems. AmeriCorps has not established data-sharing agreements with ED/FSA to pre-populate Segal Award voucher forms from existing federal student loan records. A member whose loan information is already in NSLDS should not be required to manually re-enter it on an AmeriCorps voucher form.

- NSLDS pre-population would reduce Voucher form completion burden from 5+ minutes to verification-only burden under 2 minutes
- ED/FSA data-sharing is a straightforward federal interoperability implementation that AmeriCorps has not pursued

VIII. Cross-Agency Duplication — Student Loan Servicer Fragmentation

AmeriCorps Segal Award administration interacts with multiple student loan servicers (Aidvantage, Nelnet, MOHELA, etc.) through separate form processes for each servicer. The Department of Education's student loan servicing system reforms have consolidated servicer relationships — yet AmeriCorps maintains a separate parallel form infrastructure that does not integrate with the consolidated ED servicing framework. AmeriCorps should coordinate with ED's Federal Student Aid office to integrate Segal Award disbursement into the consolidated student loan servicing framework rather than maintaining a parallel manual form process.

IX. Statutory Authority — Higher Education Act Integration Gap

The National Service Trust and Segal Education Award program is authorized under the National and Community Service Act of 1990 (42 U.S.C. 12601 et seq.). The Higher Education Act (20 U.S.C. 1001 et seq.) governs student loan programs and servicers. AmeriCorps has not leveraged the data-sharing authorities available under both statutes to integrate Segal Award administration with existing federal student loan infrastructure. The statutory framework supports integration that AmeriCorps has not pursued.

Requested: AmeriCorps must consolidate three collections into one unified Segal Award management collection; establish NSLDS/FSA data-sharing for voucher pre-population; coordinate with ED's Federal Student Aid office on servicer integration.

CNCS-2026-0001 | Comment 4 of 5 — Technology Failure, Interoperability & COTS

Docket No.: CNCS-2026-0001

Re: Segal Education Award — Voucher/Payment Form (OMB 3045-0014), Forbearance Request Form (OMB 3045-0030), Interest Accrual Form (OMB 3045-0053)

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X. Technology Failure — Manual Forms for a Digital-Native Beneficiary Population

AmeriCorps members are predominantly young adults who manage their financial accounts digitally. Yet the Segal Education Award program relies on paper-based or PDF forms for voucher payments, forbearance requests, and interest accrual — processes that the federal student loan system has largely automated for other programs. The MyAmeriCorps online portal exists but does not integrate with student loan servicer APIs, NSLDS, or Federal Student Aid systems. A member managing their Segal Award must navigate the MyAmeriCorps portal for award account information AND separately navigate servicer-specific processes AND separately complete paper/PDF forms — a fragmented multi-system workflow for what should be a single integrated digital transaction.

- MyAmeriCorps portal exists but lacks API integration with NSLDS, FSA, and loan servicer systems
- PRA requires agencies to minimize burden through automated collection — fragmented manual form processes fail this standard
- Digital-native AmeriCorps member population creates an expectation of integrated digital award management that the current form infrastructure cannot meet

XI. Interoperability Failure — Segal Award Disconnected from Federal Student Loan Infrastructure

The federal student loan ecosystem includes: NSLDS (loan data), FSA portal (account management), ED servicer APIs (payment processing), Income-Driven Repayment automation, and Public Service Loan Forgiveness tracking systems. AmeriCorps Segal Award disbursement operates in isolation from all of these systems. A member pursuing both Segal Award benefits and Public Service Loan Forgiveness must manage two completely disconnected federal program interactions with no cross-system integration. This interoperability failure multiplies member burden and creates reconciliation problems when Segal Award payments affect PSLF payment counts.

XII. Lack of Pilot Testing — No Digital Integration Pilot Disclosed

AmeriCorps has not disclosed whether it has piloted API integration between MyAmeriCorps and any major student loan servicer, or between MyAmeriCorps and NSLDS/FSA. Given that the three expiring collections are renewed simultaneously — suggesting a recurring pattern without modernization — a pilot digital integration study should be required before OMB approves another three-year renewal of paper-based form processes.

XIII. COTS Solution — Integrated Segal Award Digital Portal

A fully integrated Segal Award management portal with the following capabilities would dramatically reduce member burden:

- NSLDS API integration enabling automatic pre-population of loan servicer, account number, and balance information
- Direct servicer API connectivity for payment processing, forbearance confirmation, and interest accrual verification
- Single portal for all three current form functions — payment, forbearance, interest accrual — with unified member experience
- Login.gov identity verification eliminating manual identity confirmation requirements
- Automated notifications to members and servicers of award account balances, deadlines, and payment processing status

U.S. small technology firms with federal education program and financial services API integration experience are capable of delivering this solution under existing GSA procurement pathways at substantially lower cost than maintaining three separate paper form infrastructure systems.

Requested: AmeriCorps must pilot NSLDS/FSA API integration; develop plan for unified Segal Award digital portal; establish servicer API connectivity roadmap as condition of three-year renewal.

CNCS-2026-0001 | Comment 5 of 5 — Small Business, Security, Quality, Drag & Recordkeeping

Docket No.: CNCS-2026-0001

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XIV. Small Business Impact — Employer Workforce Development Consequences

Small businesses and HUBZone employers that hire AmeriCorps alumni face indirect impacts from Segal Award administration complexity. When AmeriCorps alumni pursuing employer-sponsored education benefits encounter Segal Award processing delays or errors, their ability to apply award proceeds to reduce employer tuition assistance obligations is affected. For small businesses in Thomas County, Georgia and similar rural HUBZone communities that actively recruit AmeriCorps alumni as part of their workforce development strategy, Segal Award program administrative burden functions as a friction point in the post-service transition that reduces the program's community economic impact.

XV. Barrier to Entry — Rural and Low-Income Member Access

AmeriCorps members serving at rural sites — including in Southwest Georgia communities — face disproportionate barriers to completing Segal Award forms: limited broadband connectivity for MyAmeriCorps portal access, limited access to in-person loan servicer assistance, and limited financial literacy support for navigating student loan forbearance and interest accrual processes. The current multi-form, multi-portal, multi-servicer interaction framework creates a de facto access barrier for the rural and low-income members the program is designed to serve. AmeriCorps should provide dedicated rural member support resources and simplified single-point form submission for members at rural and high-need service sites.

XVI. Data Security — Award Account and Student Loan Data Protection

The Voucher and Payment form, Forbearance form, and Interest Accrual form all handle sensitive personal financial information: student loan account numbers, servicer identities, loan balances, and payment authorization information. AmeriCorps has not disclosed: the security architecture for MyAmeriCorps portal handling this data, FedRAMP authorization status, encryption standards for form transmission, access controls for National Service Trust staff accessing member financial

records, or breach notification protocols. For members whose student loan data is held in multiple AmeriCorps systems, the intersection of federal financial data and federal national service program records creates a security profile that requires full architecture disclosure.

- FedRAMP authorization status and FIPS 140-2/3 validation for MyAmeriCorps portal must be disclosed
- Member student loan account data in National Service Trust systems must be covered by a published System of Records Notice and Privacy Impact Assessment

XVII. Data Quality Degradation — Three-Form Fragmentation Produces Reconciliation Errors

Managing Segal Award benefits across three separate form processes — Voucher, Forbearance, and Interest Accrual — with potentially different processing timelines, servicer acknowledgment procedures, and AmeriCorps Trust confirmation processes creates systematic data quality problems: payment applications that don't reflect current forbearance status, interest accrual records that conflict with payment history, and servicer records that are out of sync with National Service Trust records. These reconciliation errors generate member service contacts, manual correction processes, and in some cases incorrect payment applications that harm members' loan management.

XVIII. Operational Drag — Processing Delays for Time-Sensitive Loan Events

Student loan management is time-sensitive: forbearance requests must be processed before payment due dates, interest accrual payments must be applied within specific time windows, and voucher payments must be processed to meet institutional payment deadlines. AmeriCorps's manual form processing infrastructure introduces delays that can cause members to miss loan management windows — resulting in missed payments, capitalized interest, and credit reporting events that have lasting financial consequences for AmeriCorps alumni. Digital integration with servicer APIs would enable real-time processing that eliminates these time-sensitive processing risks.

XIX. Multi-Agency Pattern — Federal Student Benefit Program Fragmentation

This comment is one of multiple submissions Obelisk Tech Systems is filing across federal agency dockets. AmeriCorps Segal Award administration represents one component of a broader federal student benefit program fragmentation pattern: Pell Grant, TEACH Grant, Public Service Loan Forgiveness, Income-Driven Repayment, and Segal Award benefits are all managed through separate federal program infrastructures with minimal integration. OIRA should require ED, AmeriCorps, and other agencies administering student benefit programs to develop a unified student benefit interoperability framework that eliminates parallel manual processes and integrates benefits management into a single student-facing portal.

XX. Recordkeeping Burden — Member and Servicer Documentation Requirements

AmeriCorps members must maintain records of Segal Award applications, servicer confirmations, forbearance approvals, and interest accrual payments to manage their loan accounts and verify benefit application. Loan servicers must maintain AmeriCorps payment records separately from standard payment records. These ongoing recordkeeping obligations — required to be estimated and disclosed under 44 U.S.C. 3502(2) — are entirely absent from AmeriCorps's burden estimates for all three collections. AmeriCorps must estimate standalone member and servicer recordkeeping burden before OMB approves three-year renewals.

Final Requested OMB Action: Condition renewal of OMB 3045-0014, 3045-0030, and 3045-0053 on: (1) consolidation into a unified Segal Award information collection with single OMB number; (2) NSLDS/FSA data-sharing pilot for voucher pre-population; (3) published MyAmeriCorps FedRAMP/FIPS security architecture; (4) standalone recordkeeping burden estimate; (5) member usability study before next renewal; (6) servicer API integration roadmap. OIRA referral recommended for cross-agency student benefit program interoperability review.