



March 26, 2026

To Whom It May Concern:

This comment is in response to Public Comment Opportunity Document Number [2026-01809 Disability Accommodation Reimbursement Request Form](#).

America's Service Commissions (ASC) is a nonprofit, nonpartisan association representing the 52 Governor designated state and territorial service commissions, which administer more than 75% of AmeriCorps State and National funding and lead service initiatives in their respective states and territories. In addition to the 52 commissions, ASC membership includes more than 600 AmeriCorps programs representing AmeriCorps National, AmeriCorps State, AmeriCorps VISTA, and AmeriCorps NCCC host sites and sponsors.

Our comments listed in response to this notice will address the following areas:

- (c) ways to enhance the quality, utility, and clarity of the information to be collected;
- (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology; and

America's Service Commissions and its network appreciate the AmeriCorps agency continuing to make the Disability Accommodation funding available.

Funding is required to be made available to increase the participation of individuals with disabilities per the [National and Community Service Act of 1990](#) as amended, which states:

(k) RESERVATION OF FUNDS TO INCREASE THE PARTICIPATION OF INDIVIDUALS WITH DISABILITIES.— (1) RESERVATION.—To make grants to public or private nonprofit organizations to increase the participation of individuals with disabilities in national service and for demonstration activities in furtherance of this purpose, and subject to the limitation in paragraph (2), the Chief Executive Officer shall reserve not less than 2 percent from the amounts, appropriated to carry out subtitles C, D, E, and H for each fiscal year. (2) LIMITATION.—The amount reserved under paragraph (1) for a fiscal year may not exceed \$20,000,000. (3) REMAINDER.—The Chief Executive Officer may use the funds reserved under paragraph (1), and not distributed to make grants under this subsection for other activities described in section 501(a)(2).

We appreciate the agency providing increased transparency around the amount of funding available through the ASN Disability Accommodation Funding.



Based on experience of state and territorial service commissions and their subrecipients in accessing these funds, ASC has collected the following feedback regarding this process and the corresponding request form:

- 1) For commissions, the way the AmeriCorps agency has provided these reimbursements has been challenging because it is often a long time between submitting the request and getting reimbursed. In recent years, the reported average turnaround is four months from request to reimbursement. In some cases the length of time is much longer.
- 2) When the funds are provided, the agency has not indicated what the money was for, so it took some detective work on the part of the commission fiscal staff to connect the dots internally. Commission staff can do more internally to track this, and the AmeriCorps agency can also improve communication to alert commissions when the funds have been approved and allocated. We recommend the agency provide an email communication to the commission notifying them when the funds are added to the prime grant so commission staff can proceed with issuing the funds to their subrecipients.
- 3) The process in the past did not have a definitive timeframe by which commissions and their programs would know when they would find out if a reimbursement was going to be approved. In alignment with other AmeriCorps agency grant processes, we recommend the agency provide a response to this request form within 30 days and no later than 60 days.
- 4) If continuing to use email for submission, we recommend updating the instructions to reflect what ASN has shared verbally on its February 2026 call. “If using an email client that is not Microsoft based you need to first email accommodations@americorps.gov to request a secure file link to submit the required materials per the guidance and request form”. ASN may want to explore using an online Microsoft form or other mechanism to collect submissions in a secure and consistent manner.

Thank you for the opportunity to provide feedback on the disability accommodation request form. With questions regarding this comment, please contact Rachel Bruns at rbruns@statecommissions.org.