



July 6, 2026

AmeriCorps Agency Colleagues,

This comment is in response to the public comment opportunity related to *Agency Information Collection Activities; Comment Request; AmeriCorps VISTA Application and Reporting Forms*.

This comment is submitted on behalf of America's Service Commissions (ASC), the national association of the 52 governor-designated state and territorial service commissions. Service commissions are responsible for administering AmeriCorps State funding and promoting service in their respective states and territories. Additionally, there are more than a dozen commissions that act as AmeriCorps VISTA project sponsors, and many other who collaborate with and support local VISTA projects.

We appreciate the agency reviewing these documents and processes with the goal of streamlining and updating for clarity and understanding. With this in mind, we encourage the agency to take a deeper look at the documents and accompanying systems, materials, and processes for further streamlining.

For example, we encourage the agency to consider consolidating the VISTA Progress Report Supplement (VPRS) with the Project Process Report (PPR). Having a singular reporting period to manage, rather than two distinct and different reporting periods, would reduce the reporting and data collection/management burden on projects. (PPR is on the individual project's grant cycle, while VPRS is on the federal fiscal year for all projects).

Additionally, we noted in our review of the documents that the documents seem to be written from the view point of a project that is operated by a singular organization placing member's at only that agency (single-site or multi-service site projects) and intermediary projects find it difficult to fit the requested information into the page limits/section limits. Additionally, we suggest revising the various instructions documents for intermediary projects to make it more clear on what is required of, helpful for, and reasonable for intermediary projects to provide, and to balance the additional burden of sections where intermediaries have additional prompts or lengthier responses, like the PPR's Intermediary Project Model section which has 6 additional prompts for intermediaries. Additional examples of areas we believe further streamlining could take place:

- Within the PPR, the Sustainability narrative section is difficult to fully address for intermediary projects. We recommend making this section N/A for intermediary



projects, and instead have intermediary projects address how they ensure service locations are building sustainability in the Intermediary Project Model narrative.

- Within the PPR, the **Partnership Collaboration Development** narrative section can become very lengthy and burdensome for intermediary projects. We recommend this section be N/A for intermediary sponsors or to specify in the instructions that intermediaries should discuss what partnership development looks like as the sponsor organization, not for each individual service locations that are part of the project.

The following sections will address comments for each of the documents included in the public comment opportunity.

Concept Paper and Project Application Instructions

Streamlining the application instructions to include both the concept paper and the subsequent application instructions does not raise issue for our network. We again encourage the agency to continue to explore avenues that balances streamlining processes to fit their capacity, takes the burden on grantees into considerations, and collects necessary and impactful data.

Continuation Application Instructions

We highly recommend revising these instructions for intermediary projects to provide clear instructions on what is required of, helpful for, and reasonable for intermediary projects to provide. There are numerous sections where intermediary project's responses — especially projects with a large number of VISTA Volunteers, a large number of service sites, or large service-area (statewide, regional, or perhaps a national program) — would have a great burden to collect, condense, and collate the requested information in the current form. We encourage the agency to further review for areas of the Continuation Application Instructions that would reduce the burden on all parties involved in writing, reviewing, and approving the submission. Additional comments the Performance Measure module is provided below in the Project Progress Report Instructions section of this comment.

Project Progress Report Instructions

We have a number of recommendations and requests in response to the PPR instructions:

- Seeing the PPR turn into an annual submission — rather than semi-annual — is great.
- Having a due date of 30 days after the project end date is challenging for intermediary projects to collect all the data from service sites, then review, clarify, aggregate, and compile to submit by the deadline. We recommend and highly encourage the agency to implement a due date of 60 days after project period end date for the PPR.



- For the Member Development section, we appreciate the agency streamlining the question, however, we encourage the agency to take another look at the importance of the section as a whole. The information provided does not feel impactful and it is unclear how the agency uses this information. If the objective is to ensure that VISTA Volunteers are receiving training, perhaps simply have the sponsor certify to this fact.
- The Demographics section heading itself is confusing. If possible, we recommend changing the name of the section all together.
 - We see the addition of lines 5-7, which appear to have come over from the VPRS report. Projects should not have to report the same data, from differing time periods, on two different reports. This is evidence that the agency should consider condensing the VPRS and the PPR into one report submission for projects.
 - Additionally, lines 5-6 are data points that are rather abstract and are not clearly linked to VISTA Volunteer service since it asks about youth and veteran/military family members receiving services provided by VISTA-supported partners and service sites in all focus areas. These services may or may not have direct impacts from the VISTA Volunteers or their service activities, thus making the question broader than the scope of the VISTA project. We recommend removing these questions, or at the very least, revising the question to be clearer to collect youth and veteran/military family members receiving services provided by VISTA-supported efforts and initiatives.
- The Resource Development section is cumbersome to submit in narrative form. Is this necessary information for VISTA to collect?
- Within the Performance Measures module there is a field about the number of VISTA serving under each performance measure. Is this necessary to collect? This can get confusing to enter when a VISTA serves consecutive terms — is this 1 VISTA or 2 VISTAs; when a VISTA serves only a very short time within the reporting period; when 1 VISTA serves the second half of their term in a reporting period and a new VISTA serves the first half — this is listed as 2 VISTAs but there's only been the equivalent of 1 VISTA serving in the reporting period. If this is necessary for the agency to collect, we encourage the agency provides additional clarity on how to appropriately calculate the number to input. However, if there is opportunity to remove this field from the report, we recommend the agency move forward with removing this field.

Support Grant Budget Instructions



In the Allowable Expenses section, the language was changed to include the bolded phrase “in their second year and beyond”. Does this mean the second year with the same project, the same site, in general? Additionally, this distinction creates an imbalance between VISTA Volunteers that may be serving at the same site. It is unclear what the reasoning behind adding this phrase is. Perhaps this language should be removed, and the agency can further lean into the sponsor’s requirement to be a non-first year sponsor to utilize support funds for these purposes, as later noted in the Allowable Expenses section.

Thank you for the opportunity to provide comment. We welcome the opportunity to further discuss this comment. Please contact me at azuel@statecommissions.org, if there are any questions or opportunities for discussion.

Sincerely,

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Network & Volunteer Engagement Manager
America’s Service Commissions (ASC)