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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Application Package for AmeriCorps Program Life Cycle Evaluation-Climate Change Bundled Evaluation

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Comment from Brewer, Kirsten

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General Comment

The focus areas of the study are too narrow given the breadth of current and needed climate action. For example, Climate Corps programs can and will span:

- coastal zone resilience: such as ocean acidification, extreme weather impacts, drought, invasive species, shoreline erosion, managed retreat or coastal hardening, etc.
- transportation including pedestrian and bicycle networks, public transportation, and EV networks;
- community planning and resilience efforts;
- public health as related to environmental health like tick-borne illnesses, heat-induced illnesses, and the spread and increase of novel diseases; and
- agriculture and local foods, such as the change in growing seasons, and the need for expanding local food systems.

Some of these programs may fit neatly in the focus area of “Environmental Stewardship” per CNCS NOFOs, others may not.

The length of time for the study is much too long given the urgency of climate change and the active development of Climate Corps programs nationwide. Climate Corps programs are already in operation and many new initiatives are in the development stages and will be operational by FY24 or FY25. Results of this study in FY26 will only aid grantmakers, sponsors, and applicants in FY26/FY27. The US Climate Alliance, a group of governors committed to the goals of the Paris Agreement, is one of many groups with plans to support the development of a Climate Corps. Any study conducted by AmeriCorps must build on current and developing plans and initiatives.

There are too many questions proposed for the study and the research questions should be cut in scope to yield more impactful data. For example, some of the questions will no longer be relevant at the conclusion of the study period (questions related to COVID-19 pandemic). Key questions that will be most valuable to stakeholders include:

- More specific questions regarding equity, specifically ask groups how they incorporate environmental justice into their program and how they include community voice in the creation and ownership of programs.
- Ask programs to share their criteria and definitions for “vulnerable communities” given the rollout of the Justice40 initiative and other criteria.
- Questions regarding capacity-building to determine how programs are ensuring the effort/initiative will continue when the service-year is concluded.
- Question 18. C. is out of scope/more broad than climate change related concerns. Use more specific language around “natural climate solutions”. Some, but not all preservation or restoration activities have climate benefits/connections. It would be unfortunate if general “environmental stewardship” activities predominated the climate change discussion or this study.
- To ensure focus is on climate change and not broader environmental concerns, ask participants what climate mitigation research/science serves as the foundation for their project.
- Be more specific in asking about challenges facing grantees and applicants. Challenges facing AmeriCorps programs are well known and documented; they are not unique to climate change programs. These include: experiences with audits and the OIG; the significant cost share that needs to be raised locally; the low living allowance and the low cost per MSY; and the lack of investment in program staff and administration.
- Ask specific questions regarding training and credentials offered due to the changing needs of the labor market and new and expanded opportunities for climate careers.

Some of the questions asked of grantees will require a significant amount of lead time to ensure grantees are able to thoroughly answer the questions. To date, data collection on the demographics of AmeriCorps applicants and members has been spotty. (Applicants complete a demographic survey in eGrants, but it is unclear if that data is actually analyzed or viewed by anyone). Some grantees may have intentional systems in place to measure member growth/learning/job placement, but others may have limited capacity or support to collect this data. A well-designed study could help grantees improve their member assessment capacity.

Evaluators should be sure to include both cost reimbursement and fixed amount grantees in their survey pool. Likewise, programs in rural areas and programs serving under resourced communities should be included.