



Jehyra M. Asencio-Yace
Office of Research and Evaluation
Corporation for National and Community Service
250 E St SW
Washington, DC 20525
RE: CNCS 2022 - 17650; 87 FR 50613

October 17, 2022

RE: Public Comments from Service Year Alliance Regarding AmeriCorps Program Life Cycle Evaluation - Climate Change Bundled Evaluation

Dear Ms. Asencio-Yace:

Service Year Alliance is grateful for the opportunity to provide comment on AmeriCorps' proposed bundled climate evaluation, pursuant to 87 FR 50613. We, and the programs we work alongside through our [climate learning cohort](#), are eager to support the agency's climate resilience and mitigation priorities through its grantmaking. We are supportive of the agency's efforts to group all types of climate resilience and mitigation projects together to understand their impact holistically, including education and training, conservation, disaster response, wildfire mitigation, and energy efficiency programs.

We would suggest that the agency try to broaden this scope even further to include food recovery, green infrastructure, heat and water management, and other project types so as not to limit the climate scope to a few select program models. The initial list of research questions the agency outlines are a good starting point. That said, we would suggest that the agency also focus their attention on a clear definition of terms as well as on adding new or modifying existing questions to more explicitly capture corps member outcomes as well as how environmental justice is being prioritized in program design, recruitment, and implementation.

Moreover, we would suggest that the agency work toward building a set of climate resilience and mitigation performance metrics, in addition to these broader research questions, which would help understand the cumulative impact of the work. We elaborate more on these suggestions in section (c) below.

We have organized this public comment into four sections as requested:

- (a) Whether the collection of information is necessary for proper performance of agency functions, including practical utility;

Understanding the efficacy of the agency's grantmaking investments is important to demonstrate to policymakers, communities, and other stakeholders the value of national service and its potential for combatting the climate crisis.

A bundled evaluation is a useful way to understand similarities and lessons learned across program types while recognizing the diversity of program models and communities in which they operate. The proposed questions also seek to build the existing knowledge base for programs seeking to move into or expand their climate work, aggregating actionable lessons learned for practitioners.

- (b) the accuracy of the agency's estimate of the burden of the collection of information;

The agency has not listed a proposed time burden for evaluation participants outside of the 32 month evaluation period, so we cannot adequately answer this question. Service Year Alliance appreciates that an outside evaluator will be taking on the burden of qualitative data collection, analysis, and synthesis, and is glad to see a variety of collection methods including survey, focus group, and interview research methods. We would ask that the evaluator be mindful of the program life cycle when pursuing data collection, to be sensitive of the most time constrained periods of the year for program staff, notably during the corps member on-boarding and off-boarding periods.

The evaluator should recognize that historically it has sometimes been a challenge to collect data and connect with program staff who are not regularly in an office setting, as many conservation corps work out in the field and backcountry areas with limited connectivity. This is not to say that it is not possible, but rather, the agency should be accommodating to programs' connectivity constraints during the data collection process.

Once the evaluator has laid out a more structured research proposal, it would be helpful to notify programs of the estimated time burden of participating in the bundled evaluation and to re-evaluate whether the estimate was accurate after data collection was completed, to inform future bundled climate evaluation participants.

- (c) ways to enhance the quality, utility, and clarity of the information to be collected;

The framing and word choice of certain questions could be tightened in order to provide clarity to program respondents.

For example, the first proposed question currently reads, “How do programs/members connect their work to climate change?” The agency might first define what they mean by climate and climate change, and then proceed to ask how programs and corps members connect their work to climate change. Programs might conceptualize climate in different ways, so it would be helpful to use a standard definition.

The second proposed question, “To what extent does the program include opportunities to increase equity?” also lacks clarity. Programs responding to this question will inevitably ask equity for whom? Does this refer to equity for all potential corps members to serve, from different backgrounds, education levels, language abilities, disability status, and other markers of access? Or does this refer to equity for community-based organizations from underserved areas in accessing these grant resources? For more on this topic, please see Service Year Alliance’s recently published [Equity Agenda for National Service](#). It may be helpful to outline for programs some examples of how they promoted equitable recruitment and retention practices to attract and support diverse corps members, or how the partnerships involved in program design helped to elevate community voice and environmental justice perspectives. If the agency wants respondents to go deep in their response, they should provide more context, examples, and clear descriptions of what they mean by equity.

The final proposed question, “To what extent does participation in the climate change grant programs lead to a career in a green job after their service?” could also be reframed for clarity. Green job is an opaque term. Service Year Alliance is of the mindset that many jobs have elements that relate to climate resilience and mitigation, even ones outside of those traditionally considered to be green jobs. The agency may want to illustrate some examples of green jobs, or encourage the respondent to think broadly about what qualifies as a green job. Moreover, this statement could be impossible for programs to answer as “career” often refers to a long-term professional trajectory as opposed to the immediate job placement post-service.

The entire draft questionnaire should be screened for clarity and include more concrete definitions that could improve readability. We have not listed out all of the possible improvements but have listed our top recommendations here as guidance.

Moreover, we would also like the agency to add or edit these existing questions to better capture two important evaluation categories: a) corps member outcomes and b) how environmental justice has been a focus of program design, recruitment, and implementation.

Corps Member Outcomes

Since AmeriCorps’ inception, the agency has often been more focused on program results in the community, yet has not brought the same focus to the professional and social development of corps members themselves. Service Year Alliance believes that corps member development

is crucial to the success of national service programs and should be captured through this and other bundled evaluations.

We would encourage the evaluator to define corps member outcomes broadly, beyond functional and technical skill development. For example, question 20 and 21 should be rephrased to not only ask programs about corps members' skill development but also efficacy, sense of place, and social capital. Employers are interested in potential employees' hard and soft skills, and we know that national service is a proven driver of leadership, communication, and other soft skills.

The evaluator should also try to learn which programs are using both climate and corps member outcome metrics, and compare to see if any corps member outcome metrics are being used across programs.

Additionally, the evaluator should consider piggybacking off of other pre-existing workforce development metrics in their assessment of corps members' job placement after service (question 21c). This would allow for comparability across other Workforce Innovation and Opportunity Act (WIOA) Youth and Adult programs and would reduce the burden of data collection for programs.

Finally, the evaluator should recognize that there is an inherent tension in program design between workforce development skill building and corps member retention (question 21a), because as corps members gain new, marketable skills they often are more likely to transition early into the workforce from service programs. This does not mean that the program itself was not successful in retaining their members, but rather the opposite, that it was so effective at upskilling participants that their entry into the job market became a possibility earlier than anticipated. We would not want a situation like this to reflect poorly on the program's AmeriCorps retention rate, but rather to capture the intended workforce development outcomes for the program. The evaluator could consider asking if corps members early terminated due to job placement generally and in broadly defined green industries. The evaluator would want to make clear to program respondents that their answers would not be used to penalize the program but rather to illustrate their success at workforce preparation, given that corps member retention metrics are often a focus of audit.

Environmental Justice

Many climate-focused programs are working hard to infuse environmental justice (EJ) principles into their program design, recruitment efforts, and implementation. Evaluation metrics should try to capture this EJ focus as much as possible, for example, to better understand not only how the community was impacted by climate change prior to the program (question 8) but also how community members may or may not have been able to provide meaningful input on program design, a [key tenet](#) of locally-driven environmental justice and principle of the Justice40 initiative. Question 10 could also be rephrased to not only see how the program

serves and focuses on vulnerable communities and community members, but also how those communities and community members are able to actively drive change. For example, question 10 might be revised to read, “To what extent are programs driven by vulnerable communities and populations, including program leadership, an effort to recruit members from these communities as corps members, and in program design?” Service Year Alliance has been a proponent of intentionally incorporating belonging, inclusion, and cultural competency into corps members’ curricula, and would like to capture how programs are or are not leveraging these concepts as well to support corps members from all backgrounds.

Finally, we would suggest the agency consider several other themes to add to the evaluation’s research questions:

Recruitment

Service Year Alliance is interested in supporting the recruitment efforts of national service programs more broadly, understanding to what extent marketing a program’s climate focus factors into its recruiting strategy, and getting a sense of if that strategy has been successful. It would also be helpful to better understand if climate programs encountered recruitment challenges and what they believe could help alleviate them.

Will Research Questions Lead to Refined Performance Metrics

We are interested to learn if the agency is considering establishing a set of climate resilience and mitigation performance metrics to accompany these evaluation questions. What performance measures are currently being used that are linked to the agency’s definition of climate and climate change, mentioned above, and are new measures needed? To what extent are programs using metrics that are linked to greenhouse gas emissions reductions, and are there any that might be worth replicating across programs?

Partnership and External Funding

Modifying questions on programs’ partnership efforts and funding sources could help other programs better understand how to diversify their resource base. It might be helpful to ask directly whether programs partnered with any government stakeholders at the city, county, state, or federal level, and also what external funding outside of AmeriCorps sources supported the work.

Public vs. Private Benefit for Climate Programs

Finally, a longstanding challenge at AmeriCorps has been the constraints and definitions around providing services for a public versus private benefit, as the lines are less clear in environmental conservation and climate work. For example, many programs which work to mitigate wildfire risk encounter this barrier given that clearing brush on private lands may be prohibited due to ‘private benefit’ rules, but could help prevent the spread of wildfire and the related societal costs in rebuilding. The evaluator might want to tease this out further, to ask if the program could have produced more common/public good by providing services on private

lands. This gets out of the hypothetical and would allow the agency to better understand common scenarios and barriers for programs that could be fixed through further rulemaking.

Better Understanding Differences between Urban and Rural Programs

We believe that the national service field would find it useful to learn more about geographic differences in the bundled evaluation participants, to better conceptualize if certain lessons learned were applicable in both urban and rural settings, or only one of those geographic environments.

(d) ways to minimize the burden of the collection of information on respondents, including through automated collection methods or other IT;

It is difficult to answer this question without understanding the evaluator's research design and protocol. The evaluator should try to take as much of the data collection and analysis burden upon themselves to make it easier for programs to respond without significant time or effort burdens.

(e) estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services to provide information

Qualitative questionnaires like this one will require substantial time on behalf of the program respondents. We would ask the evaluator to be sensitive to each respondent's program life cycle to understand the busy seasons of the year and work to accommodate research into those periods with more flexibility.

We thank you for the opportunity to submit comments to the agency's planned bundled climate evaluation. We would encourage AmeriCorps and its independent evaluator to capture both climate and corps member outcomes, and to infuse environmental justice principles into the survey questionnaire. Should you have any questions or interest in discussing this further, please contact me at kbennett@serviceyear.org.

Sincerely,

Kristen Bennett
Chief Strategy Officer, Service Year Alliance