



January 12, 2023

To Whom It May Concern:

This comment is in response to Public Comment Opportunity Document Number [2022-24639 related to the 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:

- (a) Whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;
- (b) the accuracy of the agency's estimate of the burden of the collection of information;
- (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 making the Disability Accommodation funding available again.

Funding not to exceed \$20 million 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).*

It is our assumption that the reimbursement request form available for comment is connected to the up to \$20 million that may be available per statute and the recently released (October 2022) instructions posted here:

<https://americorps.gov/sites/default/files/document/FY2023 ASN Disability Accommodation Instructions 2022-10 508.pdf>.

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) Commissions and programs understand that they are required to provide reasonable accommodations to AmeriCorps members. The challenge for many programs is that for some accommodations to be provided to enable applicants/members to fully participate and serve as intended by statute, they exceed the definition of "reasonable" often due to the cost. This is where many programs struggle with the current reimbursement request form and process because they are taking a risk of expending funds when they do not know whether they will be reimbursed at all or when the resources will be granted for an accommodation that is needed yet is above and beyond the requirement for a reasonable accommodation.

It has been unclear to commissions and programs how much has been allocated to this overall and when it might be gone or getting low. Programs are all on different timelines, so some programs might be putting in requests later than others, and if it is a "first come, first served" arrangement, that could put some programs at a disadvantage. **We recommend the AmeriCorps agency provide transparency on the amount of funds available and periodic (no less than quarterly) updates on the amount of available funding, so programs know whether funds are still available.** This will not completely alleviate, but will help mitigate, the fear of not being reimbursed if there is awareness of funds available and potentially increase the ability of programs to provide accommodations that exceed what they otherwise would be able to provide.

**Alternatively, we would recommend the agency change this from a reimbursement-based request form to a process where programs can be pre-approved for funding that can be utilized for accommodations prior to funds being spent. This would assist programs in being able to communicate with applicants, before they are members, as to whether the program can provide the**



**necessary accommodations (that are above and beyond the requirements for reasonable accommodations).** Commissions have shared many examples of scenarios where the program would have needed a commitment that funds will be reimbursed in order for them to enroll an applicant that needed accommodations above what is considered reasonable.

- 2) 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 addition, 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.** Anything beyond that is unnecessarily burdensome for programs to know whether the funding will be available or if they need to use other funding to cover the accommodations.
- 4) We encourage the AmeriCorps agency to provide more consistent training to programs about disability inclusion, accommodations, and the reimbursement request form process. As it has been a few years since this process has been available, there are many that do not have awareness about the availability of funds for accommodation reimbursement.
- 5) The form should specify in question 4, 5, and 6 that the organization single point of contact name, email, and phone number for the request is a contact at the prime level, which for most programs is a commission contact.
- 6) The form should state whether it needs to be submitted in its original form as a Word or alternative 508 compliant document format.
- 7) The form should be updated to reflect the AmeriCorps agency's new branding and logo.



- 8) We also recommend the agency update the time burden on the form from nine minutes to two hours. The process for programs to compile the answers to the questions is much more time intensive than nine minutes. We recommend updating the collection to at least two hours to reflect the following:
  - a. Collecting the receipts and related financial information from the program financial staff
  - b. Completing a corresponding form for a commission or prime grantee to collect the information
  - c. The prime grantee reviews and works with subrecipient on any clarification and questions
  - d. The prime grantee completes the form and submits the request to the AmeriCorps agency

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](mailto:rbruns@statecommissions.org).