



Meg Ansara
Acting Chief of Program Operations
Corporation for National and Community Service
250 E St SW
Washington, DC 20525
RE: 88 FR 6239/OMB 3045-0179

March 2, 2023

RE: Public Comments from Service Year Alliance Regarding Disability Accommodation Reimbursement Request Form and Disability Inclusion Processes

Dear Ms. Ansara,

Since its creation, national service — and specifically AmeriCorps — has been an incredible opportunity for more than one million people to serve their communities and the nation, transforming lives, strengthening communities, and fueling civic renewal. As the agency looks to make national service more accessible and equitable for young Americans of all backgrounds, it is critically important to reassess and strengthen the process for disability accommodation, including the disability accommodation reimbursement request form, to increase awareness about the disability accommodation process and eliminate barriers to participation, for both prospective AmeriCorps members and programs.

Per authorizing statute, AmeriCorps sets aside two percent of all funding to support reasonable accommodations for national service participants with disabilities, although programs continue to report that these funds are difficult to obtain. Programs are encouraged to seek outside funding to support accommodation expenses, and while they can apply for this supplemental federal financial support, they are expected to invest in the accommodation costs up-front and apply for reimbursement which may or may not be approved, putting the burden of accessibility expenses on the program as opposed to the federal agency. To alleviate this issue, AmeriCorps should consider reconfiguring the form to allow programs to be pre-approved to receive such accommodation resources, as opposed to having to fully front the cost without knowing whether or not any resources are available for reimbursement. Pre-approval would allow programs to better communicate with prospective AmeriCorps members with disabilities during the application process about available accommodations.

Additionally, AmeriCorps should identify a more specific timeframe by which programs and commissions should receive decisions as to whether disability accommodation resources will be provided, ideally within 30 days and no later than 60 days after the initial form is submitted. This would put this form in line with other agency forms and processes. Publicizing the process, including an explicit time frame, would provide greater clarity for programs as to when approvals can be expected, helping them plan for contingencies should resources not be available.

We appreciate AmeriCorps increasing the time burden to complete the form in recent modifications, from nine minutes to 20 minutes. However, even with this change, the time burden increase does not accurately reflect programs' efforts to complete this form and would be better represented by a two hour time burden. The form asks programs to indicate "what organizations and outside community resources were consulted in securing funding for or arranging accommodations." That required engagement of external organizations should be captured in the form's time burden. A two hour time burden would also better capture the time needed to compile receipts as well as prepare the needed documentation between the commission/prime grantee and program/subgrantee.

We appreciate that the agency is considering making available a web-based form. In addition to making the form available online, we would encourage AmeriCorps to also publish more and clearer information online to notify prospective corps members with disabilities about how they can serve and reiterate that they are an important part of the national service community. Currently, the AmeriCorps website's [disability and accessibility page](#) does not describe in plain language how prospective AmeriCorps members with disabilities can access reasonable accommodations, only prospective federal employees. Similarly, the [online FAQ for prospective corps members](#) states that "we strive to create an inclusive environment and offer reasonable accommodations for applicants with disabilities," but does not explicitly lay out the process for prospective applicants with disabilities or programs on how to seek that accommodation. We applaud AmeriCorps for hiring a Disability Program Manager in the Civil Rights Office under the [Equity Action Plan](#)'s recommendations. We would encourage that Office to think holistically about disability inclusion beyond the accommodation reimbursement request form, and offer greater transparency on AmeriCorps' website similar to the Peace Corps' approach related to [the accommodation process](#) and [alumni testimonials from the disability community](#).

Congressional intent clearly indicates that national service was intended to be accessible to young people with disabilities. AmeriCorps should make these accommodation resources more accessible to programs, and should also incorporate the specific accommodation process and alumni experiences of corps members with disabilities more clearly into recruitment and public-facing materials. For more on Service Year Alliance's broader approach to accessibility, please see our recently published [Equity Agenda for National Service](#). We thank you for the opportunity to submit comments to improve AmeriCorps' disability accommodation

reimbursement request form and related disability inclusion processes. Should you have any questions or interest in discussing this further, please contact me at kbennett@serviceyear.org.

Sincerely,

Kristen Bennett
Chief Executive Officer, Service Year Alliance