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Submitter Info

Comment:

I am writing this comment on behalf of Reading & Math, Inc. Reading & Math, Inc. is a national nonprofit that replicates evidence-based AmeriCorps programs. Annually Reading & Math, Inc. is awarded 2,168 slots annually across 5 states through a variety of AmeriCorps state and national grants. We are commenting because we are interested in the impact the proposed changes to the AmeriCorps State and National Grantee Progress Report (GPR) will have on our data collection efforts. This comment pertains to the following additions to the proposed GPR document under the Demographics (End-of-Year Only) section of the AmeriCorps State and National on page 1.

--Number of previously unemployed AmeriCorps members who gain employment --Number of veterans serving as AmeriCorps members who gain employment --Number of AmeriCorps members who earn a high-school diploma or GED --Number of AmeriCorps members who enroll in post-secondary education --Number of AmeriCorps members who remain in the education field post-service

These additional demographics would require data collection from members pre and post service. We recommend that these questions are self-reported through members in the exit survey in MyAmeriCorps instead of reported by programs in the GPR. There are several reasons why we'd like to propose eliminating the additional demographic questions outlined above. We feel adding the questions to the MyAmeriCorps exit form is the most efficient way to collect the data. The questions require collecting new baseline data either pre-service or at the beginning of a member's term of service as well as after the member completes their term of service to be able to show the change (i.e. unemployed to gaining employment). This poses several challenges.

1. We would need to contact members post-service to obtain information on gaining employment or enrolling in post-secondary education. This could become problematic as data privacy laws are rapidly changing and we could face restrictions on how we use a member's contact information post-service in the future if the General Data Protection Regulations are further adopted by states in the U.S.
2. There is a high potential for a low-response rate to a survey sent after the member has exited which would impact the accuracy of the data. The proposed change is unclear at what point in time we are measuring if these changes have occurred.
3. We feel the estimated burden of time of 4,540 hours to implement this across the 372 annual number of responses is low. This averages to 12.2 hours per response. Creating and modifying our current technological systems for member demographics is a time-consuming process that could take 20 hours alone. Each member would need to respond to these 5 questions pre and post service for a total of 10 additional questions. We estimate the time for a member to respond to be 5 minutes. $2,168 \text{ members} \times 5 \text{ minutes} = 180.6 \text{ hours}$ just to collect the information. Additional time would be needed for aggregating and actually reporting as the demographics section is only one part of the GPR. This greatly exceeds the average of 12.2 hours per response estimated.
4. Having the data within MyAmeriCorps would allow CNCS to connect these data points to additional demographic data points on the member. CNCS would be able to tie the demographics the member reports at the beginning of their term to the data the member reports at the end of their term. We feel strongly that the benefits of gathering the data do not justify the burden to programs because results will be inaccurate, inconsistent, and

difficult to gather. Because of these reasons we believe the collection of this information is not necessary for the functions of CNCS and will have no practical utility due to the unreliability of the data. We think the grantee burden would be minimized and the data would be more accurate if the data collection occurred with member exit survey in MyAmeriCorps. *🌐

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Government Agency Type:

Government Agency:

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