#### Frequently Asked Questions: AmeriCorps State and National Evaluations

#### **Background**

These FAQs are intended to explain the AmeriCorps State and National (ASN) evaluation requirements and CNCS' expectations for ASN grantee evaluations. Additionally, the FAQs provide information for ASN applicants and grantees/subgrantees to help them plan and conduct successful evaluations of their CNCS-supported programs. The goal of this policy guidance is to help ensure that the evaluations conducted by ASN grantees/subgrantees are an effective and appropriate tool to help them improve their program interventions and move forward on the evidence continuum.

#### **Evaluation Requirements**

#### 1. Where can I find the evaluation requirements for AmeriCorps State and National grantees?

The evaluation requirements for AmeriCorps State and National (ASN) grantees can be found in the AmeriCorps regulations: 45 CFR §§2522.500-.540 and .700-.740.

#### 2. Do my evaluation requirements differ based on my grant type?

Yes. The chart below summarizes those differences:

If you are a	The following evaluation needs to be conducted
AmeriCorps State Competitive grantee with an annual CNCS grant under \$500,000	Internal or Independent Evaluation
AmeriCorps State Competitive grantee with an annual CNCS grant of \$500,000 or more	Independent Impact Evaluation
AmeriCorps National/Tribal Grantee with an annual CNCS grant under \$500,000	Internal or Independent Evaluation
AmeriCorps National/Tribal Grantee with an annual CNCS grant of \$500,000 or more	Independent Impact Evaluation
AmeriCorps State and National Education Award Program (EAP) or No-Cost Slot grantee, regardless of funding amount	Internal or Independent Evaluation
AmeriCorps State Formula grantee	Evaluation as specified by your state commission

#### 3. What are the evaluation requirements for competitive AmeriCorps State and National grantees?

If an ASN State Competitive or National/Tribal grantee has received at least three years of competitive funding for a project, they are required to submit an evaluation plan when they recompete for competitive AmeriCorps funding for the same project (see 45 CFR § 2522.340 for the definition of "same project"). If an ASN State Competitive or National/Tribal grantee has received at least six years of competitive funding for a project, they are required to submit an evaluation plan AND evaluation report when they recompete for competitive AmeriCorps funding for the same project.

The type of required evaluation depends on the size and type of competitive grant awarded:

AmeriCorps National Direct grantees and AmeriCorps State Competitive grantees (with the exception of Education Award Program or No-Cost Slot grantees) that receive an average annual CNCS grant of \$500,000 or more must conduct an independent impact evaluation. For further information on the requirements for grantees in this category, see the "Large Grantee Evaluation Requirements" section below.

AmeriCorps National Direct grantees and State Competitive grantees with average annual CNCS grants of less than \$500,000, as well as all AmeriCorps Education Award Program and No-Cost Slot grantees, are required to conduct either an internal or an independent evaluation, which does not need to be an impact evaluation. For further information on the requirements for grantees in this category, see the "Small Grantee Evaluation Requirements" section below.

#### 4. What time period must my evaluation cover?

Evaluations of AmeriCorps National/Tribal and State Competitive grantees must cover at least one year of CNCS-funded service activity for the same project (see 45 CFR § 2522.340 for the definition of "same project"). "One year," in this context, refers to activities that take place during one program year. Depending on the program design, these activities may or may not span a full 12 months.

#### 5. What are the evaluation requirements for AmeriCorps State Formula grantees?

AmeriCorps State Formula grantees are required to follow the evaluation requirements established by their respective State Service Commission. Applicants for State Formula grants should contact their State Commission for their grant evaluation requirements. Unless otherwise noted, the guidance in this document is for competitive ASN grantees.

## 6. What are the evaluation requirements for single-state AmeriCorps programs operating in states or territories without commissions?

Single-state AmeriCorps grantees operating in states or territories without commissions are required to comply with the evaluation requirements for State Competitive grantees.

#### **Large Grantee (> \$500,000) Evaluation Requirements**

## 7. What does CNCS expect of grantees that receive an average annual CNCS grant of \$500,000 or more and are required to conduct an independent impact evaluation?

If an AmeriCorps National or State Competitive grantee receives an average of \$500,000 or more per year from CNCS during a three-year grant cycle, they will be expected to conduct an independent impact evaluation during that grant cycle. An evaluation is considered *independent* if it uses an external evaluator who has no formal or personal relationship with, or stake in, the administration, management, or finances of the grantee or of the program being evaluated. An *impact evaluation* is designed to provide statistical evidence of the impact of the program compared to what would have happened in the absence of the program (i.e. evaluations that include a comparison or control group). The evaluation should provide statistical evidence of how well a program works and what effect it has on service recipients and/or service participants compared to what would have happened in the absence of the program. In addition, high-quality evaluations must be designed to provide evidence of a causal relationship between program activities and outcomes (45 CFR § 2522.700). Grantees must use an experimental or quasi- experimental design. The evaluation method should match the size, scale, and purpose of the program.

An impact evaluation should be guided by measurable and clearly defined research questions that identify the effect of program participation on program service recipients and/or service participants for specific outcomes. The research questions and outcomes should be identified in the evaluation plan.

#### 8. Are Large grantees required to conduct an impact evaluation in every grant cycle?

Large grantees that have already conducted an impact evaluation for the same project can request an Alternative Evaluation Approach (AEA) to conduct a different type of independent (external) evaluation. See the <u>AEA Guidance</u> for details about what must be included in this request. The subsequent independent evaluation activities should build on the findings from the impact evaluation to strengthen the evidence base for their program and make continuous improvements to the program. For example, subsequent evaluation activities may be designed to answer questions that arose during or as a result of past evaluations; conduct a cost-benefit analysis based on the impact findings; examine the relationship between components of the program model and the program's impacts; or test the effectiveness of the program when replicated in new communities or expanded to reach new populations. Grantees are encouraged to work with an experienced evaluator to identify evaluation activities that will build on past evaluation findings and strengthen the evidence base for their program.

9. I am a Large grantee who has previously completed an impact evaluation. The last time I recompeted (in 2019 or earlier), I received an exemption from the impact evaluation requirement without needing to submit an Alternative Evaluation Approach (AEA) request. Does my exemption still hold?

Large grantees who recompeted in 2019 or earlier and had previously conducted an impact evaluation were automatically exempted from the impact evaluation requirement for that grant cycle. If you are a grantee that falls into this category, you will be automatically granted an AEA for your current grant cycle. You will need to re-apply for this AEA (with the appropriate justifications specified in the AEA guidance) the next time you recompete for funding. See the <u>AEA Guidance</u> for details about what must be included in this request.

10. I am a Large grantee who has not conducted an impact evaluation at my own project site(s), but I am implementing an intervention (program model) that has already been rigorously evaluated at other sites. Do I still need to conduct an impact evaluation?

Large grantees who are replicating an evidence-based intervention with fidelity can request an Alternative Evaluation Approach (AEA) to conduct a different type of independent (external) evaluation. See the <u>AEA Guidance</u> for details about what must be included in this request. If AEA approval is granted, the grantee is strongly encouraged to conduct a well-designed implementation study.

#### 11. How does CNCS calculate the \$500,000 threshold for Large grantees?

The \$500,000 threshold is based on the average annual funding the grantee receives from CNCS (the CNCS share only, not the program's total budget with matching funds) during the three-year grant cycle in which the evaluation is conducted. When a grantee recompetes for funding, if the grantee is requesting \$500,000 per year or more from CNCS in their recompete grant application, the grantee will be considered a Large grantee and will be required to submit an evaluation plan that will meet the requirements for a Large grantee in the upcoming three-year grant cycle.

#### 12. Will changes in requested funding in continuation year 2 or 3 affect the \$500,000 threshold?

If a grantee is awarded a different amount of CNCS funding in years 2 and/or 3 of a grant cycle, it will affect the three-year average funding used to calculate evaluation requirements for that grant cycle. If the change will move the grantee above the \$500,000 average funding threshold, they will need to

revise their previously-approved evaluation plan to meet the Large grantee requirements. If the change will move the grantee below the \$500,000 average funding threshold, the grantee will have the option of revising their previously-approved evaluation plan to meet the Small grantee requirements.

13. I am a grantee who last recompeted in 2019 or earlier, and I am currently conducting an internal/non-impact evaluation. However, the awarded funding level in my current three-year grant cycle qualifies me as a Large grantee according to the updated FAQs. Do I need to switch to an independent impact evaluation?

You are welcome to switch to an independent (external) impact evaluation if you are able to do so. However, you will be automatically approved for an Alternative Evaluation Approach (AEA) that exempts you from the requirement to complete an impact evaluation during your current grant cycle. The next time you recompete for funding, you will need to submit an evaluation plan that aligns with the updated grant-size calculation methodology.

14. I am a grantee who last recompeted in 2019 or earlier, and I am currently conducting an independent impact evaluation. However, the awarded funding level in my current three-year grant cycle qualifies me as a Small grantee according to the updated FAQs. Can I switch to a non-impact evaluation?

CNCS encourages you to continue implementing the independent (external) impact evaluation if you are able to do so. If continuing with the current impact evaluation is not feasible, you may submit a revised evaluation plan, with the proposed changes in track-changes mode, as an attachment to EvaluationPlans@cns.gov (an AEA request is not required in this case, since switching to a non-impact evaluation meets CNCS evaluation requirements for a Small grantee). CNCS will notify you via email if the revised evaluation plan is approved.

#### **Small Grantee (< \$500,000) Evaluation Requirements**

15. What does CNCS expect of grantees that receive an average annual CNCS grant of less than \$500,000, or that receive an Education Award (EAP) or No-Cost Slot grant, and are required to conduct either an independent or internal evaluation?

Grantees with an average annual grant under \$500,000, as well as those that receive Education Award (EAP) or No-Cost Slot grants, are required to submit an evaluation that may be conducted by either an internal or an independent evaluator. An evaluation is considered *internal* if it is conducted by an individual from the grantee's own organization or other stakeholders, such as board members, partners, or volunteer affiliates. Small grantees are not required to work with an external individual or entity, such as a university or research firm, to conduct their evaluation. However, grantees are encouraged to use evaluators with training and/or experience with rigorous evaluations and may use an independent evaluator, if preferred.

While CNCS encourages Small grantees to use the most rigorous evaluation design feasible, they are not required to conduct an experimental or quasi-experimental evaluation. When selecting a study design, grantees should consider the various options and select the design most appropriate for the program. Grantees may opt for a process, implementation, or impact evaluation. However, CNCS strongly encourages grantees to build on outcome data collected through existing performance measurement efforts and implement a design that includes assessment of program outcomes and a study comparison group, which can help to determine whether outcomes can be attributed to the program.

#### **Timing of Evaluations**

#### 16. When should evaluations be completed and/or submitted?

AmeriCorps competitive grantees must (1) submit an evaluation plan with each recompete application after their initial three years of competitive funding; (2) conduct an evaluation during their subsequent three years of competitive funding; and (3) submit a report of the findings from their evaluation when recompeting for funding again (§2522.730).

First time applicants for AmeriCorps funding are not required to submit an evaluation plan with their application and grantees are not required to conduct an evaluation during their initial three-year grant period. However, it is highly recommended that grantees begin the evaluation planning process during their initial three-year grant cycle so that they have a strong evaluation plan and are prepared to conduct a high-quality evaluation if selected for funding during a subsequent grant award period. CNCS encourages grantees to proactively use evaluation resources and assistance made available by CNCS. Refer to the CNCS Evaluation Core Curriculum course, Laying the Groundwork for Your First Evaluation, for additional information.

In summary:

If you are applying for	The following must be submitted with your application:
Your <i>first</i> three-year competitive AmeriCorps grant	You are not required to submit an evaluation plan or conduct an evaluation during the three-year period. However, if you are planning to re-compete for funding, it is highly recommended that you begin the evaluation planning process during the first three-year grant period. You are also required to submit a data collection plan as described in the "Data Collection Plans" section of these FAQs.
Your <i>second</i> three-year competitive AmeriCorps grant	You must submit an evaluation plan and are required to complete the evaluation described in the approved plan during the second three-year grant period.
Your <i>third</i> three-year competitive AmeriCorps grant	You are required to submit: 1) a report detailing the results of the evaluation conducted during the second grant period; and 2) an evaluation plan for the third three-year grant period that will build on the results of the evaluation from the second three-year grant period.
A competitive AmeriCorps grant beyond your third three-year grant award	You must continue to submit an evaluation plan for each successive three-year grant period and a report with findings from the evaluation conducted in the previous grant period.

## 17. I have already completed an evaluation for my program. Do I have to keep conducting new evaluations during every grant cycle?

Yes. Grantees who continue to recompete for funding must continue to submit evaluation plans for each grant period, as well as evaluation reports documenting the results of their most recent evaluation, with their recompete applications. CNCS expects that each subsequent evaluation will be developmentally appropriate for the program's lifecycle and will build on the findings from previous evaluation efforts in order to strengthen the evidence base for the program and make continuous improvements to the program.

#### 18. How should I implement my evaluation during my three-year grant cycle?

In order to complete a high quality evaluation on time to meet regulatory requirements, CNCS recommends the following timeline for conducting an evaluation during a three-year grant period:

Year 1	Revise evaluation plan for CNCS approval (if needed); Hire external	
	evaluator (if applicable); Develop and pilot test data collection instruments	
Year 2	Collect data	
Year 3	Analyze data and complete evaluation report	

Grantees are expected to complete their report on evaluation findings in time to submit the report with their next recompete application. If the outcomes being studied in the evaluation require longer-term measurement that will extend beyond this timeframe, grantees may request an Alternative Evaluation Approach (AEA) on the basis of timing. See the <u>AEA Guidance</u> for more details.

## 19. What happens if a grantee does not conduct an evaluation that successfully fulfills the AmeriCorps evaluation requirements by the end of their second three-year grant award?

If a grantee has not completed an evaluation that fulfills the AmeriCorps evaluation requirements, they should detail in the application narrative the evaluation activities that they have carried out to date, along with any evidence that they have gathered on the impact of their program, when they submit a recompete application. The grantee should also provide an evaluation plan with their application that details their evaluation activities in the next grant cycle. The evaluation plan should be designed to fulfill the evaluation requirements.

Recompeting grantees should keep in mind that evaluation reports and evaluation plans are a required part of the AmeriCorps funding process. If a grantee that is required to submit an evaluation report and/or evaluation plan fails to do so, CNCS will take this into consideration in making funding decisions. CNCS reserves the right to not consider an application that does not include the requisite evaluation report.

#### **Alternative Evaluation Approaches**

#### 20. What if my program can't meet the evaluation requirements as established?

Grantees may be eligible to apply for approval of an Alternative Evaluation Approach (AEA). AEA requests can be made on the basis of program structure, timing, replication of an evidence-based program, or a previously completed impact evaluation. Refer to the <u>AEA Guidance</u> for additional information.

#### 21. How do I request an Alternative Evaluation Approach?

Alternative Evaluation Approach (AEA) requests should be submitted along with your recompete grant application. Requests submitted outside of the recompete grant application process may be considered under limited circumstances; such requests must be submitted as email attachments to <a href="mailto:EvaluationPlans@cns.gov">EvaluationPlans@cns.gov</a>. See the <a href="mailto:AEA Guidance">AEA Guidance</a> for details about the required format and content of AEA requests.

#### 22. How will I know if my Alternative Evaluation Approach request is approved?

You will be notified via email about whether your AEA request is approved or denied. Please retain AEA approval notifications as grant records along with your approved evaluation plan. If your AEA request is denied, you must conduct an evaluation that meets the established evaluation requirements for your grant.

## 23. I was approved for an Alternative Evaluation Approach (AEA) during my current competitive grant cycle. Can I continue using the same AEA for my next competitive grant cycle?

AEA approvals are granted for one three-year grant cycle only. You must submit a new request for an Alternative Evaluation Approach the next time you recompete for competitive funding.

#### **Submission and Review of Evaluation Plans**

#### 24. What should be included in my evaluation plan?

All AmeriCorps State and National competitive grantees, regardless of grant size or type, are required to submit evaluation plans when they recompete for funding. In order to facilitate approval of evaluation plans, grantees are required to include as much information as possible for each of the following elements in the evaluation plan submitted with their applications:

- A short description of the theory of change why the proposed intervention is expected to produce the proposed results
- Outcome(s) of interest clear and measurable outcomes that are aligned with the theory of change and will be assessed during the evaluation
- Research questions to be addressed by the study concrete research questions (or hypotheses) that are clearly connected to the outcomes
- Proposed research design for the evaluation including a rationale for the design selected, an assessment of its strengths and limitations, and a description of the main components;
- Description of the data sources, sampling methods, measurement tools, and data collection procedures that will be used in the evaluation
- Analysis plan that clearly describes the methodology/ies that will be used to analyze the collected data
- A timeline for the evaluation that describes how the evaluation will cover at least one year of CNCS-funded activity and will be completed within the three-year timeframe of the grant
- Qualifications needed for the evaluator
- The proposed budget

For more information about evaluation plans, refer to the <u>CNCS Evaluation Core Curriculum</u> course, "How to Write an Evaluation Plan."

#### 25. What will CNCS do with evaluation plans submitted with the application?

CNCS will review and approve evaluation plans for all applicants that are selected to receive a competitive grant. Evaluation plans will be reviewed to ensure that all necessary plan components (see the FAQ above) are present in the plan; that they are described in sufficient detail to be sure that the evaluation is likely to meet requirements if well implemented; and that resources have been allocated appropriately to ensure successful implementation. Grantees whose originally submitted plans are not approved will be asked to revise their evaluation plans to address the review feedback.

Evaluation plans must be approved by the end of the first year of the three-year grant cycle in which an evaluation is required. Once the plan is approved, grantees will be required to implement the evaluation specified in the approved plan during that three-year grant cycle.

#### 26. What should I do if I need to change my approved evaluation plan?

If you wish to change your evaluation plan after it has been approved by CNCS, you must submit a

revised version of the plan (with the proposed changes in track-changes mode) as an attachment to EvaluationPlans@cns.gov. CNCS will notify you if the changes are approved and will work with you to amend your grant to reflect the revised plan. Until/unless the revised plan is approved by CNCS, you must continue implementing the previously approved version of your evaluation plan.

The revised plan must align with CNCS' established evaluation requirements or the requirements specified in an approved Alternative Evaluation Approach (AEA) for your current grant cycle. If the revised plan will not meet those requirements, you must submit a new AEA request along with your revised evaluation plan.

#### **Submission and Review of Evaluation Reports**

#### 27. What should be included in my evaluation report?

Evaluation reports should include an introduction to the project; a description of the evaluation design and methods; and a section on the findings and results of the evaluation. For more information about what to include in an evaluation report, refer to the course entitled "Reporting and Using Evaluation Results" on the <u>CNCS evaluation resources page</u>.

#### 28. What will CNCS do with evaluation reports submitted with grant applications?

Expert evaluators will assess the quality of the evaluation design and implementation, the strength of its findings, and whether the evaluation met CNCS requirements and was conducted in accordance with the grantee's approved evaluation plan. These assessments may be used to inform CNCS's consideration of the selection criteria and for the purpose of assessing the quality and outcomes of your program (45 CFR § 2522.740). Refer to the *Notice of Funding Opportunity* for additional information on how evaluation reports will be used during the review process.

CNCS will provide feedback on required evaluation reports for all applicants.

## 29. What happens if a grantee that is required to submit an evaluation report does not submit it by the due date?

Evaluation reports are a required component of the AmeriCorps competitive application process. If a grantee that is required to submit an evaluation report fails to do so by the application due date, CNCS will take this into consideration when making funding decisions. CNCS reserves the right not to consider an application that does not include the requisite evaluation report.

#### 30. How are evaluation reports used post-award?

Evaluation reports are used by CNCS staff in three ways: First, to identify training and technical assistance needs and support to foster continuous improvement and identify programmatic areas that need attention. Second, to identify and share promising practices and models that merit replication. And third, to strengthen the evidence base for the impact of national service. CNCS posts grantee evaluation reports on the online Evidence Exchange in order to share best practices and promote the use of evidence-based program models.

Evaluation reports should be used by organizations to strengthen their program and their impact. Not only can evaluations measure the impact on participants and beneficiaries, they can provide feedback on the extent to which program implementation aligns with the program model and whether impacts differ for different aspects of the program or for different populations. These findings should guide program improvement, adjustment, and future action.

#### 31. What happens if a grantee's evaluation report shows null or negative findings?

Evaluation findings are one way that applicants can demonstrate evidence of a program's impact, and as such may be used in consideration of the selection criteria and to assess the quality and outcomes of a proposed program model. However, applications with evaluations that show null or negative findings will not automatically be excluded from competitive consideration. Applicants should use relevant sections of the application narrative to demonstrate how they have learned from the evaluation findings and made program improvements to address weaknesses or unexpected findings. Applicants should also develop evaluation plans for the coming grant cycle that will build on the findings from the previous evaluation and help the program continuously improve. Grantees are encouraged to work with an experienced evaluator or use CNCS evaluation technical assistance resources to identify how the evaluation findings can be used as a learning tool.

#### **Data Collection Plans**

#### 32. What should first-time applicants include in their data collection plans?

Grantees in their first three years of funding are required to submit a data collection plan to CNCS with their grant application. Data collection plans should include:

- A description of the applicant's data collection system and how it is sufficient to collect high
  quality performance measurement data during the first three years of the grant. If the applicant
  does not yet have a data collection system, describe the plan and timeline for developing a high
  quality system.
- A description of how the applicant will use performance data (including CNCS performance measures and other process and outcome measures if applicable) to improve its program in the first three years of funding.

The purpose of the data collection plan is to ensure that grantees are developing data collection systems that will allow them to collect high quality data for measuring their performance and guiding their program operations. Grantees should use the collected data to test their intervention, inform changes or innovations to their program model, and lay the groundwork for future evaluations.

CNCS may require first-time applicants to submit data collection instruments if a grant is approved for funding.

#### **Other Ouestions on Evaluations**

#### 33. What is the difference between performance measurement and evaluation?

According to the Government Accountability Office's (GAO) performance measurement and evaluation glossary, performance measurement is "the ongoing monitoring and reporting of program accomplishments, particularly progress towards pre-established goals" (glossary, pg. 3). Evaluations, on the other hand, are "individual systematic studies conducted periodically or on an ad hoc basis to assess how well a program is working" (GAO glossary, pg. 3). While performance measures track whether a program has met its objectives, goals, or targets, program evaluations analyze a wider range of information, including important contextual information on the program, beneficiaries, and the external environment, than is feasible to track on an ongoing basis (GAO glossary, pg. 3, 4).

Performance measurement and evaluation both include systematic data collection, and performance measurement data may be included in analysis conducted for an evaluation.

For example: a reading tutoring program identifies the need and a theory of change for addressing that need, e.g. students are reading below grade level and the tutoring program can help them achieve reading success. The program develops performance measures and identifies a primary outcome to measure their ability to address the need, e.g. the primary outcome is to have students reading at or above grade level by the end of one year. The program tests students' reading ability as part of their performance measurement activities and gathers evidence of the extent to which the students who participate in the tutoring program improve their reading ability and are reading at grade level after one year. The program then designs an evaluation that will allow them to compare the outcomes for the students who participate in the tutoring program with a similar group of students that does not receive the tutoring services. By comparing the outcomes for the two groups, the evaluation can determine whether the students' improved reading skills can actually be attributed to the tutoring program and not to other factors, such as regular reading improvement or classroom instruction. The greater the capacity of the evaluation to control for the differences between the students who receive tutoring and the comparison group and their experiences (outside of participation in the tutoring program), the stronger the case can be made that the improvement in tutored students' reading ability, when compared to the other group, was the direct result of the tutoring program.

Additional information on how evaluation differs from performance measurement can be found in the AmeriCorps regulations <u>45 CFR § 2522.700</u>.

## 34. Is it required that evaluations measure the impact of the primary service activity on the service beneficiaries or the community? May evaluations measure the impact of the program on member development?

Evaluations must measure the impact of one or more significant program activities, but not necessarily the primary service activity. CNCS strongly encourages grantees to conduct evaluations that will provide rigorous evidence of beneficiary impact and demonstrate that the program is an effective means to solve community problems. However, CNCS also recognizes that the impact of program participation on AmeriCorps members may represent a significant component of a grantee's theory of change. In such cases, an evaluation focused on member outcomes is allowable.

## 35. My program design has changed so much that it is basically a new program. Am I still required to evaluate it?

It may not be developmentally appropriate for grantees to conduct an impact evaluation if the program design has undergone considerable changes. In such cases, a Large grantee may request an Alternative Evaluation Approach (AEA) based on structure. Large grantees whose AEA requests are approved will still be required to conduct an evaluation that is appropriate for the program's life cycle (e.g., a process or outcome evaluation). Small grantees that have changed considerably are also required to conduct an evaluation that is appropriate to the program's life cycle (e.g., a process or outcome evaluation).

When reviewing requests for an Alternative Evaluation Approach as a result of changes in program design, CNCS will assess whether the program submitted for competitive funding satisfies CNCS's definition of "same project" (45 C.F.R.§ 2522.340). A program will be considered the "same project" if CNCS cannot identify a meaningful difference between the two programs based on a comparison of the following characteristics, among others:

- a) The objectives and priorities;
- b) The nature of the services provided;
- c) The program staff, participants, and volunteers involved;
- d) The geographic locations in which the services are provided;
- e) The populations served; and
- f) The proposed community partnerships

#### 36. Are multi-site grantees expected to evaluate all of their sites?

CNCS recommends that multi-site grantees evaluate a representative sample of operating sites, if not all of the sites. If a sample of sites are selected, the evaluation results should articulate how the results can be generalized to the other sites, and should describe any key elements of variation (e.g. operations, size, type of location, program activity) among the included and excluded sites. The most important factors are that the sites chosen for evaluation are appropriate within the context of the evaluation design and methodology and can serve as a representative sample for all of the program sites.

37. I am an organization that has both a National Direct grant and one or more state subgrants, all of which are using the same program model. Can I use the evaluation of my National Direct grant to cover the evaluation requirements for my state subgrants?

State subgrants are legally distinct from National Direct grants and so have separate evaluation requirements, even if they are utilizing the same program model or intervention. In order for an evaluation to meet the requirements for a particular grant or subgrant, the evaluation must cover activities that take place at site(s) supported by that specific grant/subgrant. So if the National Direct evaluation includes sites supported by the National Direct grant AND sites supported by a state subgrant, the National Direct evaluation can be used to meet the requirements for both grants. Otherwise, the state subgrant must conduct a separate evaluation of its own site(s).

38. For grantees, including multi-focus intermediaries, that serve as umbrella organizations for many different types of service activities (e.g. support mentoring, health, public safety, and environmental programs), what should they evaluate?

Grantees that support multiple types of service activities are not required to evaluate every activity and should work with their evaluator to determine what to evaluate. Several factors may be considered in deciding which type(s) of service activities should be evaluated and how they should be evaluated. For example, grantees may want to focus on the primary service activity as defined in the application. Grantees may also want to evaluate elements of the program's theory of change that are common to all the service activities, such as volunteer leveraging, capacity-building results, or the ways in which AmeriCorps members add value to operating sites or service locations. In addition, grantees should consider program maturity, preliminary evidence of effectiveness, and the feasibility of conducting a high quality evaluation for the different types of service activities.

#### 39. How much should I budget for evaluation?

The cost of evaluations vary widely and will depend on the type of study design, the size of the study, the level of expertise and experience of the evaluator, and data collection expenses. The more rigorous the level of evidence the evaluation is designed to provide or detect, the higher the evaluation costs are likely to be. For example, randomized control trials (RCTs), which use an experimental study design, tend to be more expensive than other evaluations, but also tend to yield the highest level of valid and rigorous evidence. Keep in mind that evaluation costs tend to be driven by the type and amount of data collected. For example, an evaluation collecting a large amount of new data from beneficiaries will typically cost more than an evaluation collecting a smaller amount of new data, or than one that uses existing or administrative data. For more information about budgeting for evaluation, refer to the course entitled "Budgeting for Evaluation" on the CNCS evaluation resources page.

40. Are organizations that receive CNCS funding from more than one funding stream (i.e. AmeriCorps State and National, VISTA, or Senior Corps) required to conduct separate evaluations for each program?

Organizations are required to evaluate each of their awarded projects in accordance with the evaluation requirements of the CNCS funding stream that supports that project. Depending on the

characteristics of the organization and programs, it may be possible for the grantees to develop a single evaluation design capable of meeting the evaluation requirements of more than one funding stream. In addition, it is possible that part of the evaluation requirements may be covered if the project has been included in a national or a statewide evaluation. If an individual organization receives more than one type of funding, grantees should work with their state service commission and/or CNCS staff to determine if a separate evaluation is required for each funding stream.

## 41. Are AmeriCorps grantees required to submit evaluation instruments to the Office of Management and Budget (OMB)?

No. These requirements apply only to Federal Executive Departments and agencies, branches of the military and other establishments of the Executive Branch of the federal government. While not required, CNCS encourages grantees to pursue institutional review board (IRB) clearance for evaluations collecting data from human subjects. IRBs are tasked with reviewing evaluation and research plans to ensure that researchers protect the rights of subjects participating in the planned research. IRB clearance may be especially important if grantees seek to publish their work in academic journals. IRBs may be associated with universities, localities (e.g. a local government or school district), or independent research firms.

# 42. How does the language in §2522.710 of the regulations, which states that CNCS may "supersede these requirements with an alternative evaluation approach, including one conducted by the Corporation at the national level," apply to the evaluation requirements?

CNCS's Office of Research and Evaluation periodically undertakes national evaluations. State or National grantees who participate in these evaluations may meet the evaluation requirements through their participation. CNCS will notify grantees of such national evaluation efforts as they emerge. We encourage programs to participate if invited to do so. Due to resource constraints, most CNCS evaluation studies will focus on certain types of programs. For example, CNCS may be interested in conducting a study of mentoring programs, and only a nationally representative or random sample of programs conducting these activities may be asked to participate in the study.

If a program participates in a national evaluation conducted by CNCS, that program may be exempt from the requirement to provide an internal or independent evaluation for the next grant cycle if the evaluation provides findings that fulfills the grantee's evaluation requirements. The program should describe its participation in the national evaluation when presenting their evaluation plan for that grant cycle. Results must be disaggregated by program to ensure consistency across the entire national portfolio, although those individual results are not always made public due to confidentiality constraints. Nevertheless, the program is required to submit its evaluation results as part of its recompete application in order to meet the evaluation requirement.

## 43. Where can I locate an independent evaluator and what should be the selection criteria for choosing one?

Universities are good sources for evaluators. Peers and state service commissions may be able to provide recommendations or a list of college and university contacts that have evaluation expertise. The CNCS Office of Research and Evaluation holds research grant competitions for institutions of higher education, and these universities could serve as local resources. A listing of current and previous grantees can be found at this link: <a href="https://nationalservice.gov/impact-our-nation/research-evaluation/cncs-research-grant-program/grantee-profiles">https://nationalservice.gov/impact-our-nation/research-evaluation/cncs-research-grant-program/grantee-profiles</a>.

National conferences such as those hosted by the Association for Research on Nonprofits and Voluntary Action (ARNOVA), the American Evaluation Association (AEA), and other nonprofit organizations can

also be excellent sources for referrals to evaluators. There are many entities dedicated to conducting program evaluations and these typically have the breadth and depth of expertise and resources to carry out rigorous evaluations. The American Evaluation Association website provides a list of research firms/evaluators available by state.

Evaluator qualifications are critical to a successful evaluation that will improve the program's level of evidence. Here are some criteria to consider when selecting an evaluator:

- Years of experience
- Successful completion of similar types of evaluations for similar social service programs
- Experience in evaluating similar types of programs in similar settings
- Capacity and/or access to other resources necessary to manage the scale and scope of the
  evaluation (e.g. staff has the time to commit to the project; the organization has the resources
  to collect and analyze breadth of data needed)
- References from previous clients
- Absence of investment in the program to be evaluated; independence is essential to avoid potential or perceived bias on the part of the evaluator.

In planning for an evaluation, grantees should identify the qualifications required for the evaluator and then assess potential evaluators on the extent to which their previous experience and training provide them with the background necessary to meet those qualifications. When selecting an evaluator, grantees should also consider any potential conflicts of interest. For example, there is potential and perceived conflict of interest if the evaluator played a role in designing the program, or if the person supervising the evaluator is connected to the program in some way. Finally, CNCS offers additional advice on hiring an external evaluator in the <a href="Evaluation Core Curriculum">Evaluation Core Curriculum</a> module, "Managing an External Evaluation".

Grantees must follow all applicable federal and state procurement regulations when hiring an external evaluator. Refer to 2 C.F.R § 200.317-200.320 for more information.

#### 44. Where can I access additional information on evaluation?

Evaluation resources, including the CNCS Evaluation Core Curriculum, evaluation policies, and information about evaluation-related technical assistance, are available on the <u>Evaluation Resources Page</u> of the CNCS website.

#### 45. How can I get additional help to build my organization's evaluation capacity?

One-on-one evaluation technical assistance (TA) is available free of charge to AmeriCorps State and National grantees and subgrantees. The TA Portal can be accessed at <a href="https://americorpsevaluationta.norc.org">https://americorpsevaluationta.norc.org</a>.

Examples of the types of requests that may be made through the TA Portal include:

- Answering questions on evaluation design and approach
- Providing feedback on evaluation materials and data collection tools
- Advising on data collection and/or analysis procedures
- Discussing approaches for identifying an external evaluator
- Requesting assistance with evaluation plans that have not yet met CNCS requirements for approval

Eligibility requirements for requesting TA are:

- Grantees and subgrantees must currently be competitively funded by CNCS
- Grantees and subgrantees conducting external evaluations may only submit requests after consulting with their external evaluator

- State subgrantees may only submit requests after consulting with their State Commission
- State Commissions receiving Commission Investment Funds to support evaluation TA should attempt to resolve TA requests with CIF resources, if applicable, before advising subgrantees to request assistance through the TA Portal

Requests may be submitted at any time during the grant cycle, are not limited by the grantee's funding amount, and will not affect current or future awards. Grantees are not limited in the number of requests they can make and are encouraged to seek assistance proactively

#### **For State Commissions**

#### 46. Does participation in a statewide evaluation fulfill the evaluation requirements?

If a program participates in a statewide evaluation, that program may be exempt from the requirement to provide an internal or independent evaluation for the next grant cycle if the evaluation provides findings that fulfill the grantee's evaluation requirements. The program should describe its participation in the statewide evaluation when presenting their evaluation plan for that grant cycle. Results must be disaggregated by program to ensure consistency across the entire state portfolio, although individual results may not be made public due to reasons of confidentiality. Nevertheless, the program is required to submit its evaluation results as part of its recompete application in order to meet the evaluation requirements.

### 47. Is a state commission required to submit the evaluations for its formula programs to CNCS?

No. However, CNCS is very interested in developing best practices in evaluation design and implementation. If a state commission has an example of a strong evaluation from a formula grantee that they would like to share with CNCS, we encourage them to do so.

## 48. When a commission submits a former formula program to CNCS as a state competitive application, is the application required to include an evaluation plan and/or report?

If the grantee has never received competitive funding, the grantee is not required to submit an evaluation plan or report in the first competitive grant cycle but is required to submit a data collection plan for their first three years of competitive funding.

If the grantee has received competitive funding in the past, requirements are determined as follows:

- If the grantee has received at least three years of competitive funding for the same project, an evaluation plan is required.
- If the grantee has received at least six years of competitive funding for the same project, an evaluation plan and an evaluation report are required.

CNCS recognizes that some grantees move from competitive to formula and back again. Commissions are encouraged to develop evaluation requirements for formula grantees that will keep them on track to meet competitive evaluation requirements.