

Alternative Evaluation Approach (AEA) Guidance for AmeriCorps State and National Grantees

Background information

CNCS believes that program evaluation is a critical component of building the evidence base for national service and demonstrating that programs are making a difference in communities. Per 45 CFR § 2522.710-730, all recompeting AmeriCorps State and National competitive grantees are required to conduct an evaluation covering at least one program year for the same project and to submit the completed evaluation to CNCS with their next recompetite evaluation. Grantees receiving \$500,000 or more per year from CNCS are required to conduct an independent impact evaluation that aligns with the language in 45 CFR § 2522.700. While rigorous impact evaluation is the only definitive way to demonstrate that changes in outcomes were caused by the AmeriCorps intervention, CNCS recognizes that impact evaluations as defined in the CFR are not appropriate in all cases. CNCS also recognizes that there may be situations in which the evaluation requirements specified in the CFR may not align with a program's life cycle or meet a grantee's most critical information needs. CNCS has therefore created a process for grantees to request approval of an Alternative Evaluation Approach (AEA) from CNCS that would allow them to use a different type of evaluation design or timeline when appropriate.

For some program designs, it is extremely difficult to conduct an impact evaluation that requires comparing outcomes for service beneficiaries or members to outcomes for a comparison group or control group because some programs face insurmountable challenges to forming a comparison group. We also recognize that some programs are conducting evaluations for which there is value in measuring and reporting results in a timeframe that extends beyond the current grant cycle. Finally, CNCS recognizes the value of aligning evaluation activities with the program's developmental stage and position on the evidence continuum; as such, an impact evaluation may not always be appropriate. Approving an AEA in these circumstances allows CNCS to maintain evaluation rigor while recognizing that there are limited circumstances under which some flexibility will help achieve the underlying goals of the evaluation requirement, which are to support program improvement and demonstrate that CNCS investments are making a difference.

Grantees requesting an AEA are required to demonstrate that they are using the most rigorous evaluation design that is feasible for their particular circumstances. Furthermore, the evaluation must meet all CNCS evaluation requirements that are not superseded by the approved Alternative Evaluation Approach.

Authority to grant approval of an Alternative Evaluation Approach

Under 45 CFR § 2522.710, "The Corporation may, in its discretion, supersede [the evaluation requirements] with an alternative evaluation approach, including one conducted by the Corporation at the national level."

Request and approval process

Grantees requesting an AEA must provide the following:

- A written AEA request that describes the following:
 - The evaluation constraints faced by the program

- Why the proposed alternative approach is the most rigorous option feasible
- How the proposed approach will help the grantee build their evidence base or is otherwise necessary
- Any other required information or attachments based on the requested AEA type (see below)
- A written evaluation plan that is consistent with the AEA request and that includes, at a minimum, the required evaluation plan elements listed in the NOFO.

Requests for AEA approval should be submitted as part of the 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 EvaluationPlans@cns.gov. The AEA request must include all of the information in the bullets listed above. AEA requests will be reviewed by the CNCS Office of Research and Evaluation (ORE).

ORE will assess the request for an Alternative Evaluation Approach and the evaluation plan in consultation with the AmeriCorps State and National (ASN) program office. Grantees may be asked to revise their submitted evaluation plan to ensure that it (1) fully aligns with the AEA request and (2) is the most rigorous option feasible. If needed, ORE may also follow up directly with the grantee to gather additional information needed in order to make a determination. If the AEA request and the written evaluation plan are approved, the grantee will be authorized to conduct an evaluation for that grant cycle as specified in the written evaluation plan. If the evaluation is carried out as specified, the grantee will have met the evaluation requirements for that grant cycle.

AEA approvals are granted for one three-year grant cycle only. The grantee must submit a new request for approval of an Alternative Evaluation Approach and a new written evaluation plan during the grant application process when recompeting for future funding.

Bases for approval of an Alternative Evaluation Approach

(1) Structure of AmeriCorps program or grantee organization (Large grantees only)

Grantees may request approval of an Alternative Evaluation Approach if either of the following two conditions apply:

- a) The grantee demonstrates insurmountable challenges to forming a comparison group. CNCS anticipates that relatively few program designs will be approved for an Alternative Evaluation Approach on this basis.
 - Grantees requesting an AEA on this basis must explain why the challenges to forming a comparison group are not surmountable due to the nature of the program design
- b) It is not developmentally appropriate for the grantee to conduct an impact evaluation due to significant changes in program design or other evaluation readiness factors such as variability or lack of confirmed fidelity in the program model.
 - Grantees requesting an AEA on the basis of changes to program design must explain how their program design has changed significantly enough that it no longer meets the definition of “same project” (45 CFR § 2522.340).
 - Grantees requesting an AEA on the basis of evaluation readiness must explain why it is not developmentally appropriate for the program to conduct an impact evaluation at this time. Grantees may either submit a narrative justification or may provide a copy of a completed [CNCS Evaluability Assessment Tool](#) with additional narrative explaining how the results of the assessment justify the request for an Alternative Evaluation Approach.

(2) Previous impact evaluation (Large grantees only)

Grantees may request approval of an Alternative Evaluation Approach if they have previously conducted an impact evaluation of the same project. The impact evaluation must have been well-designed and well-implemented and must have demonstrated evidence of effectiveness on one or more key desired outcomes of interest.

- Grantees requesting an AEA on this basis must: (1) submit their previous impact evaluation report as part of their recompetite application, (2) specify in the written AEA request the name and date of completion of the impact evaluation, and (3) describe in the AEA request how the impact evaluation is still applicable to the grantee's current program design. **In order for an AEA request of this type to be approved, the recompetite application must be assessed by reviewers as having Moderate or Strong evidence and must receive satisfactory assessments on the Evidence Quality review criteria.**
- If AEA approval is granted, the grantee is strongly encouraged to conduct an evaluation that builds on the findings from the previous impact evaluation in order to strengthen the evidence-base for their program and make continuous improvements.

(3) Replication (Large grantees only)

Grantees may request approval of an Alternative Evaluation Approach if they are implementing an evidence-based intervention with fidelity in a new setting. Such an intervention must be supported by strong, consistent findings from experimental or quasi-experimental study/ies in contexts and with beneficiary populations similar to the ones in which the grantee is operating. Examples could include a specific site of a multi-state program for which evidence exists from other sites, or a grantee implementing the same intervention that has been rigorously evaluated by another AmeriCorps grantee.

- Grantees requesting an AEA on this basis must: (1) submit copies of the experimental/quasi-experimental study report(s) being replicated as part of their recompetite application, (2) specify in the written AEA request the name(s) and date(s) of completion of the study/ies being replicated, and (3) describe in the AEA request (a) how the intervention described in the study/ies will be implemented with fidelity in the new setting, and (b) how the beneficiary population is similar. **In order for an AEA request of this type to be approved, the recompetite application must be assessed by reviewers as having Moderate or Strong evidence and must receive satisfactory assessments on the Evidence Quality review criteria.**
- If AEA approval is granted, the grantee is strongly encouraged to conduct a well-designed implementation study during the current grant cycle.

(4) Timing (Large or Small grantees)

Grantees may request approval of an Alternative Evaluation Approach if they are planning to conduct an evaluation that will not be completed during the current grant cycle and for which findings will not be available until a later date. This type of timing extension may be considered if there is articulated value in longer-term measurement and reporting or because the outcomes of interest follow natural cycles that are not aligned with the grant cycle. If interim findings will be available during the current grant cycle and such interim findings are aligned with the final outcomes to be measured, the grantee should submit such findings in an interim evaluation report when they recompetite for funding. **AEA approval is only required if the interim evaluation report will not meet the grantee's evaluation requirements.**

- Grantees requesting an AEA on the basis of timing must: (1) explain in their AEA request why the nature of the research questions or outcomes being studied require longer-term measurement that will

extend beyond the three-year grant cycle, and (2) specify the timeframe in which they will submit their final evaluation report to CNCS.

- If AEA approval is granted, the grantee will be required to submit an implementation report when they recompile for funding. The implementation report must describe the progress the grantee has made to date in conducting their evaluation.

Insufficient bases

Expectations for conducting comparison group impact evaluations have been articulated in the CFR, and grantees are expected to comply with these expectations if they do not meet the criteria listed above. The following are NOT sufficient to support approval of an Alternative Evaluation Approach:

- Lack of necessary funds budgeted for evaluation
- Challenges in data collection such as setting up a data collection system or accessing administrative data
- Failure to conduct timely planning of the evaluation or avoidable delays in planning or implementing the evaluation
- Failure to successfully implement a planned evaluation for which forming a comparison group was feasible and for which reasonable challenges should have been anticipated and accounted for in the evaluation plan.

Eligibility

AmeriCorps State and National grantees receiving over \$500,000 (“Large grantees”) are eligible to apply for approval of an Alternative Evaluation Approach for any of the reasons outlined in the document.

AmeriCorps State and National grantees receiving less than \$500,000 or EAP/No Cost Slot grantees (“Small grantees”) are eligible to apply for approval of an Alternative Evaluation Approach on the basis of timing.