

February 2012

# MEASURING PERFORMANCE

## The Corporation for National and Community Service Faces Challenges Demonstrating Outcomes



G A O

Accountability \* Integrity \* Reliability

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## Abbreviations

CNCS	Corporation for National and Community Service
NCCC	National Civilian Community Corps
VISTA	AmeriCorps Volunteers in Service to America

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United States Government Accountability Office  
Washington, DC 20548

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February 17, 2012

The Honorable Tom Harkin  
Chairman  
The Honorable Michael B. Enzi  
Ranking Member  
Committee on Health, Education, Labor & Pensions  
United States Senate

The Honorable John Kline  
Chairman  
The Honorable George Miller  
Ranking Member  
Committee on Education and the Workforce  
House of Representatives

It is important for federal agencies—and their grantees—to demonstrate the impact of their work and ensure the efficient use of their resources. This becomes even more important during times of fiscal stress and tight budget constraints as Congress makes difficult funding choices. In fiscal year 2011, Congress appropriated approximately \$1 billion for the Corporation for National and Community Service (CNCS)—the federal agency responsible for administering the country’s national service programs—to carry out a variety of federally funded programs, such as AmeriCorps. Through these programs, CNCS provides grants to more than 70,000 volunteer organizations to address a range of community challenges through service activities such as tutoring children, responding to natural disasters, or helping seniors to live independently. In 2009, the Serve America Act made substantial changes to CNCS’s mission, including giving CNCS new areas of emphasis, such as working with veterans, and directing it to focus more on performance evaluation and cost-effectiveness.<sup>1</sup> The Serve America Act also mandated that we perform a series of reviews relating to program effectiveness with respect to CNCS’s performance measures.<sup>2</sup>

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<sup>1</sup>Pub. L. No. 111-13, §§ 1101(6), 1302, and 1607, 123 Stat. 1460, 1463, 1485, 1532.

<sup>2</sup>Id. at § 1712, 123 Stat. 1460, 1551.

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In 2010, we reported that the performance measures from CNCS's previous strategic plan were poorly aligned with its strategic goals and did not demonstrate the results of its work.<sup>3</sup> Given that CNCS is in the process of implementing its new strategic plan and performance measures, we examined the following key questions: (1) To what extent does CNCS fund service activities that are covered by its performance measures? (2) What key challenges, if any, affect the ability of CNCS and its grantees to measure performance?

To answer the first question, we examined agency strategic planning and grant-making documents and budget data to better understand how CNCS allocates funding to service activities that are covered by its performance measures. We also interviewed CNCS officials to obtain information about CNCS's grant-making policies and the service activities that it funds. We also made adjustments to the programs' budgets to remove certain administrative expenses identified by CNCS such as health care stipends and child care assistance for the AmeriCorps Volunteers in Service to America (VISTA) program. Many of these costs are beyond the control of programs and should not be directly linked to the program's performance. We discussed these adjustments with agency budget officials and they concurred with our approach. To answer the second question, we conducted site visits and phone interviews with a total of 20 grantees, including 3 state service commissions.<sup>4</sup> (For a list of the grantees we interviewed, see app. II.) We selected these grantees because they are geographically diverse and cover both urban and rural locations, provide representation among CNCS's main programs<sup>5</sup> and program focus areas, and reflect varying levels of success in measuring their performance. We conducted site visits with grantees in three states—California, Maryland, and Texas—as well as in the District of Columbia. The remaining interviews were conducted by phone. During our interviews, we used interview protocols with a standard set of questions about grantees' experiences measuring performance and any

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<sup>3</sup>GAO, *Performance Measurement: Better Alignment to Strategic Goals and Data Verification Needed at the Corporation for National and Community Service*, [GAO-10-886](#) (Washington, D.C.: July 28, 2010).

<sup>4</sup>State service commissions are responsible for allocating CNCS's funding to AmeriCorps state programs and monitoring program activities.

<sup>5</sup>These main programs include AmeriCorps State and National, VISTA, National Civilian Community Corps (NCCC), and Senior Corps.

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challenges they encountered in the process. The results of our site visits and phone interviews with these 20 grantees cannot be generalized. Furthermore, we also met with CNCS officials to identify performance measurement challenges and reviewed relevant federal laws, regulations, and agency documents.

We conducted this performance audit from April 2011 to February 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We briefed your staff on the results of our analysis on January 11, 2012, and this report formally conveys the information provided during that briefing. See appendix I for the briefing slides that were presented on that date. In summary, we reported the following findings:

- CNCS officials expect that most grantees from its main programs will adopt at least 1 of the agency's 16 agency-wide performance measures. Specifically, officials told us that AmeriCorps State and National and VISTA grantees will adopt at least 1 of CNCS's performance measures by fiscal year 2012, and Senior Corps grantees will adopt at least 1 measure by fiscal year 2013. However, officials also said that they plan to fund some activities that do not fall under the performance measures, particularly activities that meet local needs and/or are innovative. For example, CNCS has funded grantees in the state of Washington to carry out gang violence prevention activities to address this community challenge. This could present challenges for CNCS as it balances accountability, using its performance measures to assess the impact of grantees' service activities, with flexibility, allowing grantees to take on projects that meet local needs. CNCS may find it difficult to demonstrate the effectiveness of its service activities that fall outside its performance measures. Additionally, CNCS faces challenges using its performance measures to promote accountability among its Senior Corps grantees, as legal restrictions make it difficult for CNCS to remove funding from grantees that consistently fail to meet their performance targets, and these restrictions include some requirements for Senior Corps programs that do not apply to CNCS's other programs. These restrictions can make it more difficult to hold these grantees accountable for performance. (For additional information on these

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legal restrictions, see app. III.) Specifically, officials told us that failure to meet performance targets is not a sufficient reason to re-compete a Senior Corps grant, and that it is very difficult to terminate a grant for poor performance. At the time of our review, CNCS officials told us that they have not yet sought statutory changes to address these legal constraints.

- Grantees we interviewed reported performance measurement challenges in four general areas that may hamper CNCS's ability to measure its impact: understanding and applying CNCS's performance requirements, developing data collection approaches, collecting data, and reporting data. For example, one grantee told us that CNCS's guidance was too broad, and as a result, it had a difficult time understanding how to match its program work to the agency's performance measurement requirements. With regard to developing data collection approaches, one grantee working with elementary and high school students reported difficulties designing an approach that would allow the program to collect and measure changes in student behavior and knowledge to demonstrate their impact. Grantees with multiple worksites and limited staff capacity pointed to challenges collecting performance data across worksites. Finally, grantees commented that it was challenging to report their performance data through eGrants, CNCS's computer system. CNCS has taken some steps to address these challenges; however, many of these steps are in the early implementation stages.

As CNCS looks for better ways to demonstrate its impact to Congress and the American public, it will be critical for the agency to hold grantees accountable for meeting performance targets. To provide other options for CNCS to hold Senior Corps grantees accountable for performance, we recommended that the Chief Executive Officer of CNCS take action to seek statutory changes, as appropriate, that would allow it to re-compete Senior Corps grants if the agency has determined current grant recipients do not meet agency performance measures, or financial management or other requirements.

We provided a draft of this report to officials at CNCS for review and comment. In response, CNCS provided written comments, which are reproduced in appendix IV. Overall, CNCS agreed with our findings, and consistent with our recommendation, the agency said it planned to seek statutory changes to address the legal constraints on Senior Corps' ability to introduce competition into those programs. In CNCS's Congressional Budget Justification for fiscal year 2013, released February 13, 2012,

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CNCS set forth the statutory changes it is seeking to address these legal constraints on the Senior Corps programs. If enacted, these changes would remove most of the constraints that currently prevent CNCS from holding Senior Corps grantees accountable for meeting performance targets. Improved accountability could enable CNCS to more fully demonstrate its impact.

In addition, CNCS provided us with technical comments, which we incorporated as appropriate. Notably, in its technical comments, CNCS said it continues to make progress aligning appropriate performance measures for its major programs. Specifically, it said that NCCC will be reporting on some of CNCS's 16 agency-wide performance measures that will capture its service work, including its activities related to disaster response. This should enable CNCS to better align NCCC's activities to the agency's goals.

With reference to our findings on CNCS's performance measures, CNCS said in its technical comments that it plans to measure performance of service activities not aligned to its key strategic goals and will require grantees to submit their programs' specific performance data in progress reports to the agency. While it is important to measure performance and report on performance for all its service activities, the diversity of these activities may make gathering, combining, and presenting robust and consistent performance information difficult and lead to challenges demonstrating the overall impact of CNCS's efforts. Thus, as emphasized in this review and our previous work, it will remain critical for CNCS to focus its performance measures on the vital few that align with its strategic goals.<sup>6</sup>

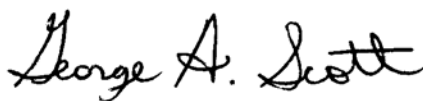
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<sup>6</sup>See [GAO-10-243](#).



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We are sending this report to CNCS, appropriate congressional committees, and other interested parties. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>. If you or your staff have any questions about this report, please contact me at (202) 512-7215 or [scottg@gao.gov](mailto:scottg@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.

A handwritten signature in black ink that reads "George A. Scott". The signature is written in a cursive, flowing style.

George A. Scott  
Director, Education, Workforce and  
Income Security Issues

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# Appendix I: Briefing Slides



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## **Measuring Performance: The Corporation for National and Community Service Faces Challenges Demonstrating Outcomes**

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**Briefing to Congressional Committees  
January 11, 2012**

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1



## Overview

- Introduction
- Research Objectives
- Scope and Methodology
- Summary of Findings
- Background
- Findings
- Conclusions



## Introduction

- In constrained budget environments, it is increasingly important for federal agencies – and their grantees – to demonstrate the impact of their work and ensure the efficient use of their resources.
- In fiscal year 2011, Congress appropriated approximately \$1 billion for the Corporation for National and Community Service (CNCS) to administer a variety of volunteer and national service programs.
- The Serve America Act mandated GAO to perform a series of reviews relating to program effectiveness with respect to CNCS's performance measures. This work is our second review.<sup>1</sup>
- Our previous work found that CNCS's performance measures aligned poorly with its strategic goals and did not demonstrate the results of its work.<sup>2</sup>
- At the time of our review, CNCS had developed a new strategic plan for fiscal years 2011-2015, which included new areas of responsibility identified by the Serve America Act (Pub. L. No. 111-13) and new performance measures.

<sup>1</sup>Pub. L. No. 111-13, § 1712, 123 Stat. 1460, 1551 (2009).

<sup>2</sup>GAO, *Performance Measurement: Better Alignment to Strategic Goals and Data Verification Needed at the Corporation for National and Community Service*, [GAO-10-886](#) (Washington, D.C.: July 28, 2010).



## Research Objectives

- Objective 1: To what extent does CNCS fund service activities that are covered by its performance measures?
- Objective 2: What key challenges, if any, affect the ability of CNCS and its grantees to measure performance?



## Scope and Methodology

- To examine the extent to which CNCS funds service activities that are covered by its performance measures, we:
  - Examined agency strategic planning and grant-making documents and budget data.
  - Interviewed CNCS officials to obtain information about CNCS's grant-making policies and the service activities that it funds.



## Scope and Methodology

- To examine the challenges that may affect CNCS's ability to measure performance, we:
  - Conducted site visits and phone interviews with 20 grantees,<sup>3</sup> including state commissions, that represented CNCS's main programs and focus areas, various geographical locations, and varying level of success with measuring performance. The information obtained cannot be generalized.
  - Reviewed relevant federal laws, regulations, and agency documents, and interviewed CNCS officials to identify performance-related challenges.

<sup>3</sup> For the purposes of this study, we are using the term "grantee" in general to describe both CNCS grantees and sponsors—those organizations that receive AmeriCorps Volunteers in Service to America (VISTA) volunteers. We did not include National Civilian Community Corps (NCCC) worksites in our interviews.



## Scope and Methodology

- We conducted this performance audit from April 2011 to February 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.





## Summary of Findings

- CNCS officials expect that most grantees from its main programs will adopt at least one of the agency's 16 performance measures.
  - Officials told us that AmeriCorps State and National and AmeriCorps VISTA grantees will adopt at least one of CNCS's performance measures by fiscal year 2012, and Senior Corps grantees will adopt at least one measure by fiscal year 2013.
  - However, CNCS faces difficulties balancing the need to measure the outcomes of its activities with providing flexibility for its programs to meet local needs.
  - Further, CNCS is limited in its ability to promote accountability among its Senior Corps grantees, as statutory restrictions make it difficult to remove funding from grantees that consistently fail to meet performance targets. However, officials told us that they have not yet sought statutory changes to address these restrictions.
- CNCS may also face challenges reporting its impact due to several grantee-related performance measurement challenges, such as collecting performance data from partnering worksites.
  - CNCS has taken steps to address grantees' performance measurement concerns; however, many of these efforts are in the early implementation stages.

## Background



## Four Programs Accounted for 90 Percent of CNCS's Budget for Volunteer Service Activities in Fiscal Year 2011

### CNCS's Fiscal Year 2011 Budget for Volunteer Service Activities, by Program, in Millions

AmeriCorps State and National		Senior Corps	VISTA	NCCC			
\$341.2		\$205.7	\$77.9	\$28.8			
<p>AmeriCorps State and National provides grants to nonprofit, public, and other organizations in part to encourage Americans of all backgrounds to volunteer to address community needs.</p> <p>AmeriCorps State and National funds are divided into two grant funding streams...</p> <table><tr><th>Competitive grants</th><th>State Formula grants</th></tr><tr><td>\$215.6</td><td>\$125.6</td></tr></table> <p>AmeriCorps Competitive grants are awarded and overseen by CNCS.</p> <p>AmeriCorps State formula grants are awarded and overseen by CNCS-funded state service commissions. These grants give states flexibility to respond to local needs.</p>		Competitive grants	State Formula grants	\$215.6	\$125.6	<p>Senior Corps provides grants to a network of about 1,200 organizations sponsoring over 1,300 projects that tap the experience, skills, and talents of Americans 55 years of age and older in part to meet community needs.</p>	<p>VISTA provides grants and full-time volunteers to community organizations to help create and expand antipoverty programs.</p> <p>NCCC is a residential, team-based program that gives young people opportunities for leadership and service while addressing national and community needs in all 50 states. NCCC is administered directly by CNCS and is not a grant making program.</p>
Competitive grants	State Formula grants						
\$215.6	\$125.6						

Source: GAO analysis of CNCS budget data.

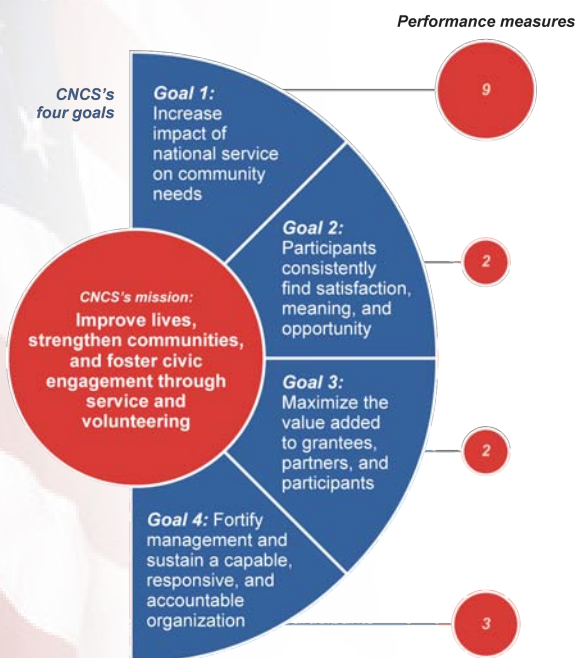
Note: Excludes administrative costs and education awards to volunteers.

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## Background



## The 16 Agency-Wide Performance Measures in CNCS's Fiscal Year 2011- 2015 Strategic Plan Will Gauge Progress Toward Its Four Goals



- Performance measures help agencies gauge their progress toward achieving their goals.
- CNCS officials told us that these 16 agency-wide performance measures reflect CNCS's priorities.<sup>4</sup>
- Officials plan to use them to demonstrate how CNCS uses its resources to fund service activities that contribute to its four goals.

Source: GAO analysis of CNCS's FY 2011-2015 strategic plan.

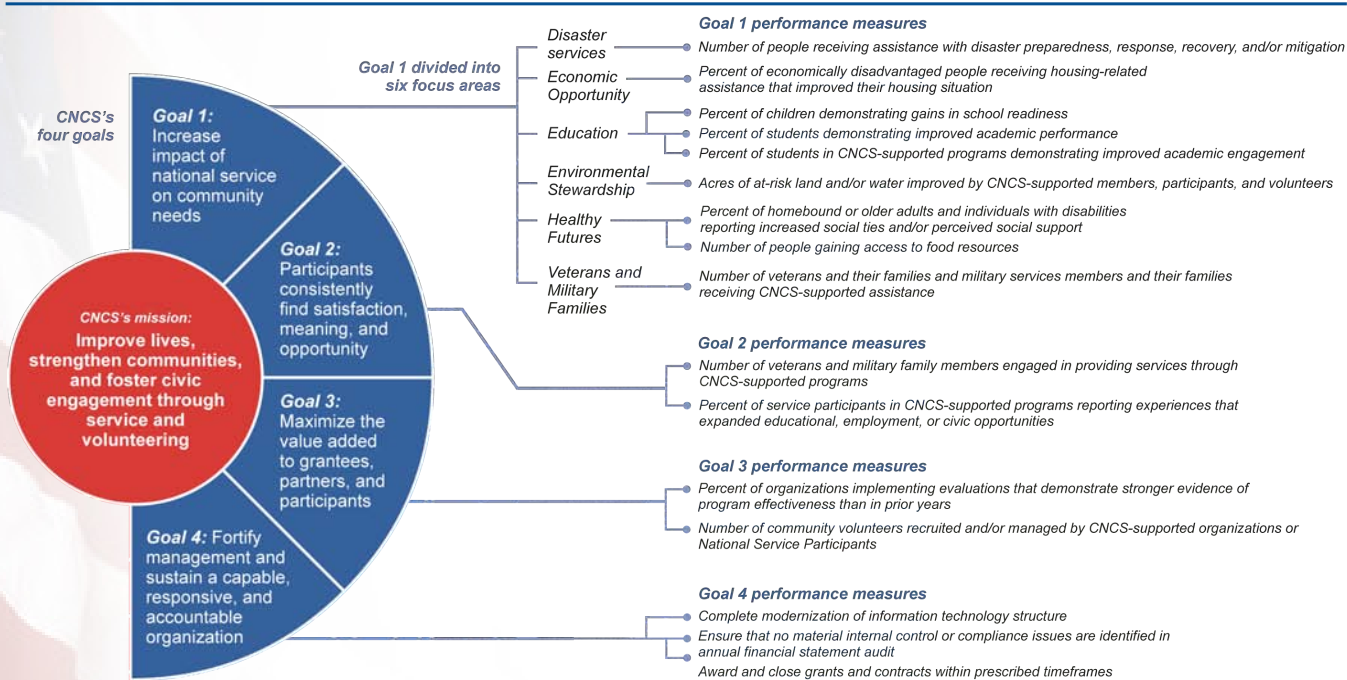
<sup>4</sup> CNCS's strategic plan includes other performance measures, but they are not agency-wide.

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## Background



## Nine of the 16 Agency-Wide Performance Measures Are in Goal 1, Divided into 6 Focus Areas



Source: GAO analysis of CNCS's FY 2011-2015 strategic plan.

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Objective 1: Adopting Performance Measures



## CNCS Expects That Most Grantees Will Adopt at Least One of its Performance Measures

- In fiscal year 2012, CNCS officials said they expect most AmeriCorps State and National and VISTA grantees to adopt at least one of CNCS's 16 performance measures voluntarily.
  - Officials said that “adopting” CNCS’s performance measures means that grantees choose one or more of the 16 measures that relate to their work, even if they do not cover all their service activities.
  - Officials told us that grantees will generally be expected to measure both the outputs and the final outcomes of their service activities. For example, the number of students who complete the program is an output, while improved academic performance is an outcome.
- Beginning in fiscal year 2013, CNCS officials also said that they expect to require Senior Corps grantees to adopt at least one of the 16 performance measures. They did not estimate a time frame for requiring other grantees to adopt them.

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Objective 1: Adopting Performance Measures



## CNCS Will Fund Some Service Activities That Do Not Align With its Performance Measures

- CNCS officials told us that they expect to fund some AmeriCorps State and National grantees that do not adopt CNCS's performance measures, but whose work is innovative or meets local needs.
  - Some service activities that may meet local needs, such as preventing gang violence or teen pregnancies, do not clearly fit within CNCS's 16 performance measures.
- AmeriCorps state formula grantees are overseen by state service commissions,<sup>5</sup> which have the authority to decide whether to require grantees to use CNCS's performance measures.

<sup>5</sup> State service commissions provide CNCS funding to AmeriCorps state formula grantees in their states through annual grant competitions. In addition, the Commissions manage, monitor and evaluate these grantees.

Objective 1: Adopting Performance Measures



## CNCS Will Fund Some Service Activities That Do Not Align With its Performance Measures

- CNCS officials anticipate that some grantees that adopt CNCS's performance measures will not use them for all the work they do, because some of their service activities do not align with the measures.
  - For example, officials expect that some Senior Corps grantees will use CNCS's performance measures for about 25 to 50 percent of their service activities.
- Additionally, Senior Corps and NCCC officials told us they are legally required to fund some service activities that fall outside the 16 agency-wide performance measures, such as providing respite to caregivers of homebound seniors.
- NCCC officials also plan to continue to use more general performance measures, rather than specific targets, for some of their work in order to retain flexibility for NCCC members to respond to disasters.

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Objective 1: Adopting Performance Measures



## CNCS Faces Challenges Balancing Performance Accountability with Flexibility

- According to CNCS officials, it is difficult to hold grantees accountable for measuring their activities' effectiveness without compromising grantees' flexibility to tailor their program activities to local needs.
  - Officials said they seek to promote accountability by using the 16 performance measures to assess the impact of grantees' work.
  - However, officials also told us that they wanted to preserve grantees' flexibility to meet local needs, even if those needs fall outside the performance measures.
- This is consistent with our previous findings that other federal grant making programs face similar challenges, because grant features that encourage performance accountability can limit grantee flexibility.<sup>6</sup>

<sup>6</sup> GAO, *Grants Management: Enhancing Performance Accountability Provisions Could Lead to Better Results*, GAO-06-1046 (Washington, D.C.: Sept. 29, 2006).



Objective 1: Adopting Performance Measures



## CNCS Faces Challenges Balancing Performance Accountability with Flexibility

- CNCS officials told us they are currently exploring ways to measure the performance of service activities that are not covered under the 16 agency-wide performance measures.
- As previously noted, CNCS plans to focus on its 16 agency-wide performance measures. However, the strategic plan contains other measures that CNCS may use to assess the activities of individual initiatives or programs. For example, among other measures, CNCS plans to collect:
  - the percent of economically disadvantaged individuals receiving employment-related assistance.
  - the number of uninsured and economically disadvantaged individuals connected to or utilizing health care services.
- However, the diversity of these activities may make gathering, combining, and presenting robust and consistent performance information difficult, leading to challenges demonstrating the overall outcomes of these efforts.

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Objective 1: Adopting Performance Measures



## CNCS Faces Challenges Holding Its Senior Corps Grantees Accountable For Performance Targets

- Senior Corps programs—Senior Companion, Retired and Senior Volunteer Program (RSVP), and Foster Grandparent—are longstanding programs that exist to connect older Americans to service opportunities.
- Officials told us that some of the volunteer organizations they fund have been grantees for several decades.
- CNCS faces legal obstacles to reducing funding for Senior Corps grantees that persistently do not meet their performance targets.
  - Even though CNCS officials told us that they will require Senior Corps grantees to adopt at least one of the 16 agency-wide performance measures by 2013, they commented that without a change in statutory authority, it can be very difficult to remove a Senior Corps grantee for poor performance alone.
  - Specifically, officials told us that performance alone is not sufficient reason to re-compete a Senior Corps grant, if the grantee is otherwise complying with the terms of the grant contract.
  - CNCS officials said that they have not yet sought statutory changes to address these difficulties.
- See appendix III for additional information on the legal obstacles that affect competition in the Senior Corps programs.

Objective 1: Adopting Performance Measures



## CNCS Faces Challenges Holding Its Senior Corps Grantees Accountable For Performance Targets

- CNCS can utilize non-financial means to help grantees meet their performance targets, such as providing public recognition or increased oversight.<sup>7</sup>
  - For example, CNCS increases its on-site compliance reviews of Senior Corps grantees that do not meet their performance targets.
- However, if non-financial methods fail to improve grantee performance, CNCS's ability to use its performance measures to promote accountability is potentially limited due to difficulties offering these grants for re-competition.

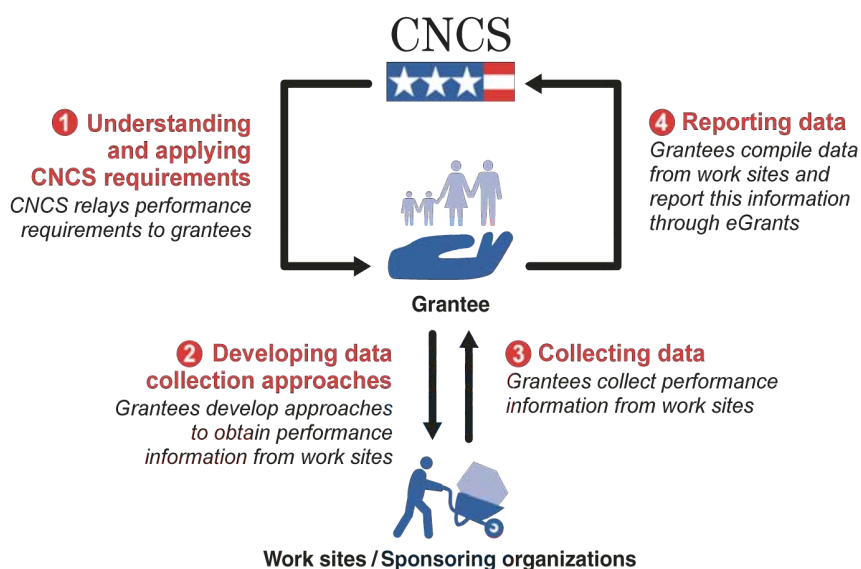
<sup>7</sup> For more information about financial and non-financial options for holding grantees accountable for performance, see [GAO-06-1046](#).

## Objective 2: Performance Measurement Challenges



## Several Grantee-Related Performance Measurement Challenges Could Hamper CNCS's Ability to Measure Its Impact

- Grantees we interviewed reported performance measurement challenges in four areas (see figure).
- CNCS has taken steps to address grantees' challenges; however, many of its efforts are in the early implementation stages.



Source: GAO analysis.

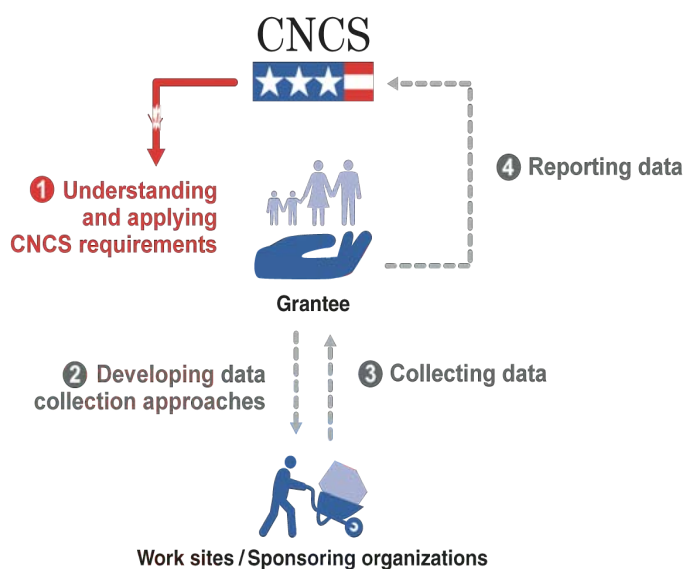
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**Objective 2: Understanding and Applying CNCS  
Performance Requirements**



## Grantees Faced Challenges Understanding and Applying Performance Information Communicated by CNCS

- Grantees we interviewed reported:
  - The information provided by CNCS was too broad and lacked specific examples related to their work.
  - Overcoming the learning curve to understanding CNCS's performance requirements was challenging.
- Since we met with these grantees, the AmeriCorps and VISTA programs have updated their guidance, and CNCS officials expect to do the same for their other key programs.



Source: GAO analysis.

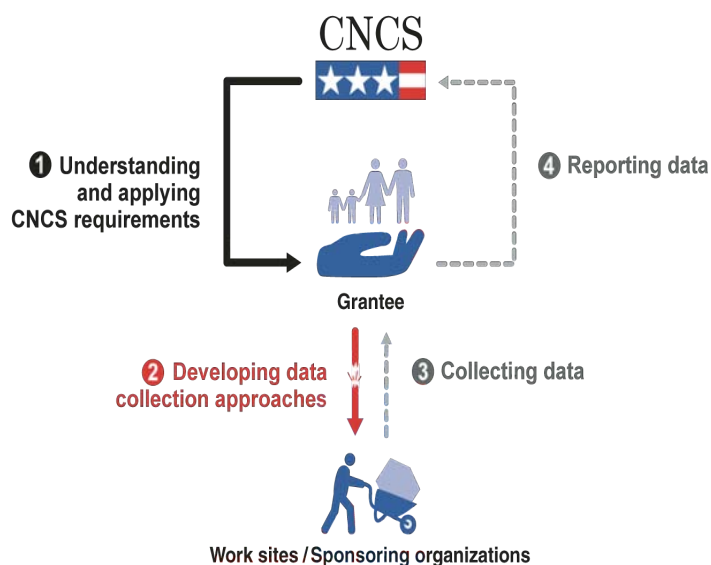
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## Objective 2: Developing Data Collection Approaches



## Grantees Faced Challenges Developing Approaches to Collect Performance Data

- Grantees we interviewed reported challenges developing data collection approaches that:
  - Measure the work performed by volunteers.
  - Link program activities with outcomes to show impact.
- CNCS is developing a performance measurement training curriculum, which may include information on developing appropriate data collection approaches. (Expected completion Sept. 2012.)



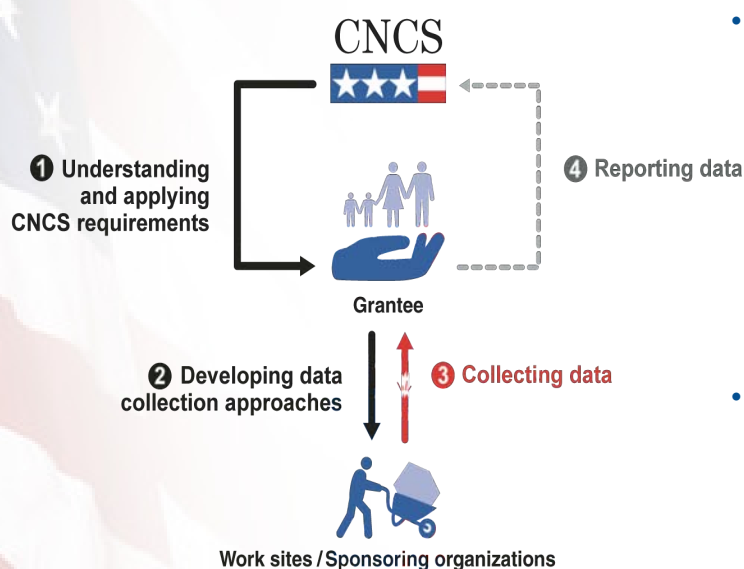
Source: GAO analysis.

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## Objective 2: Collecting Data



## Grantees Faced Challenges Collecting Performance Data from Worksites



- Grantees we interviewed reported challenges with the lack of:
  - Staff capacity or resources to collect data from multiple worksites.
  - Technology, such as a computer system, that could help them avoid manual entry of data.
- CNCS is revamping its resource center and has plans to examine grantees' data collection needs and identify possible support the agency can provide.

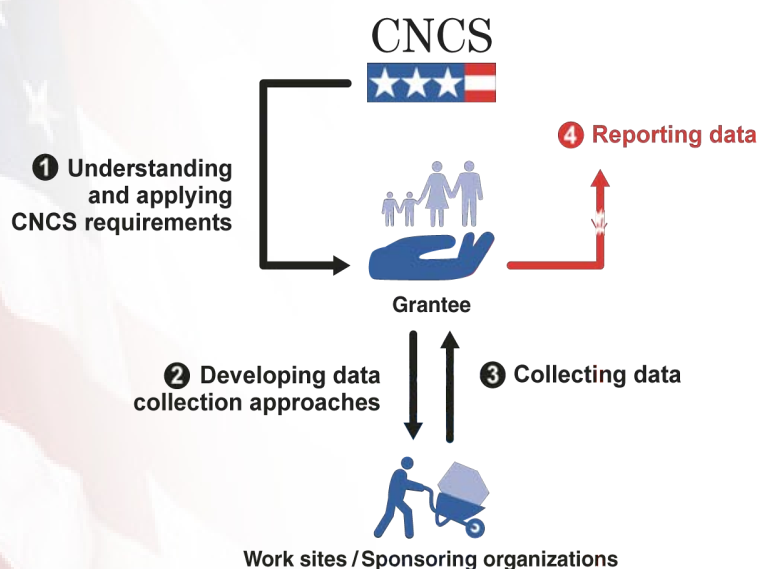
Source: GAO analysis.

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## Objective 2: Reporting Data



## Grantees Faced Challenges Tracking Participants and Reporting Meaningful Outcomes to Show Their Impact



- Grantees we interviewed reported challenges:
  - Following up with some past program participants, particularly those at-risk populations.
  - Identifying outcomes within CNCS's one-year reporting framework.
- CNCS has provided individualized technical assistance through state service commissions and its state offices.<sup>8</sup>

Source: GAO analysis.

<sup>8</sup>CNCS state offices are responsible for overseeing and providing assistance to Senior Corps and VISTA grantees.

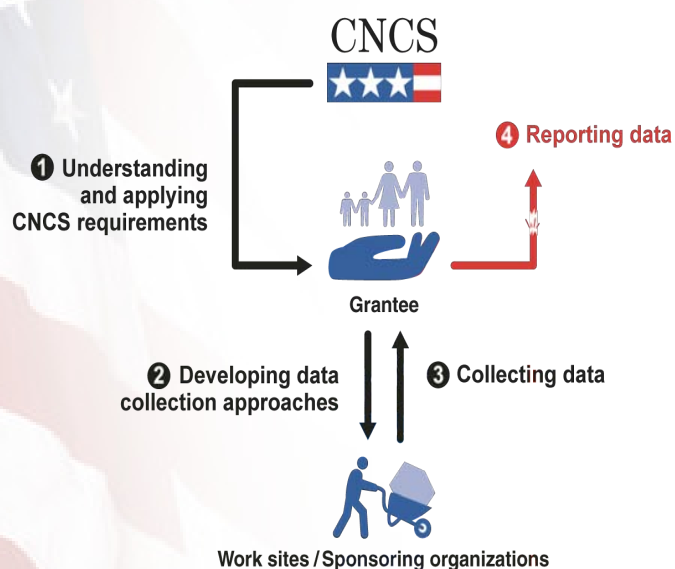
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## Objective 2: Reporting data



## Grantees Faced Challenges Reporting Performance Data Through CNCS's eGrants Computer System



- Grantees we interviewed also reported challenges:
  - Accessing the eGrants system, CNCS's electronic web-based system that grantees use to report performance data.
  - Navigating through eGrants.
- CNCS has updated its eGrants performance measurement module for AmeriCorps, and plans to develop a module that can be used across all programs by summer 2012.

Source: GAO analysis.

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## Conclusions

- CNCS faces difficulties in striking a balance between providing grantees with the flexibility to meet local needs and holding them accountable for performance.
  - Currently, not all of the work CNCS funds can be assessed under its performance measures. CNCS will face difficulties demonstrating the results of this portion of its work.
  - Additionally, CNCS's ability to use performance information to promote accountability among Senior Corps grantees may be limited, due to statutory restrictions that make it difficult to remove funding from persistently poor performers.
  - At the time of our review, CNCS had not yet sought statutory changes to address these restrictions.
- CNCS has taken some steps to address grantee-related performance challenges, but many of its efforts are in the early stages. Thus, it is unclear to what extent these efforts will fully address grantees' challenges.
- As CNCS moves forward, it will be critical for the agency to continue to monitor its efforts and the experiences of its grantees to ensure it is able to obtain meaningful performance information to demonstrate its impact to Congress and the American public.



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## **GAO on the Web**

Web site: <http://www.gao.gov/>

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# Appendix II: List of CNCS Grantees Interviewed

CNCS grantee	State	CNCS program	Focus area <sup>a</sup>
Amarillo Independent School District	TX	AmeriCorps State	Education
AmeriCorps Red Cross Florida Gulf Coast	FL	AmeriCorps State	Healthy Futures Veterans and Military Families Disaster Services
Baltimore City Health Department	MD	Senior Corps/ RSVP	Disaster Services Education Healthy Futures
California Volunteers	CA	State Service Commission	Disaster Services Economic Opportunity Education Environmental Stewardship Healthy Futures Veterans and Military Families
City of Oakland Office Department of Human Services	CA	Senior Corps/ Foster Grandparent and Senior Companion	Education Healthy Futures
Conservation Corps North Bay	CA	AmeriCorps State	Environmental Stewardship
Council of Churches of the Ozarks	MO	Senior Corps/ RSVP	Education Healthy futures
Montana Prevention Resource Center	MT	AmeriCorps VISTA	Healthy Futures Veterans and Military Families
Department of Veterans Affairs	CA	AmeriCorps State	Veterans and Military Families
Serving America's Farmworkers Everywhere (SAFE) AmeriCorps	DC	AmeriCorps National	Healthy Futures
Maryland Conservation Corps	MD	AmeriCorps State	Environmental Stewardship
Maryland Governor's Office on Service and Volunteerism	MD	State Service Commission	Economic Opportunity Education Environmental Stewardship Healthy Futures
OneStar Foundation	TX	State Service Commission	Education Disaster Services
Panhandle Community Services	TX	Senior Corps/ RSVP	Healthy Futures Disaster Services Education
Rural Action, Inc.	OH	AmeriCorps State	Environmental Stewardship
Texas Department of Aging and Disability Services	TX	Senior Corps/ Foster Grandparent Program	Education
Texas Homeless Network	TX	AmeriCorps VISTA	Economic Opportunity
United Planning Organization	DC	Senior Corps/ Foster Grandparent Program	Education
United Way of the Bay Area	CA	AmeriCorps VISTA	Economic Opportunity
Coach Across America– Up2Us	NY	AmeriCorps National	Healthy Futures

Source: GAO analysis of data from 20 CNCS grantees.

<sup>a</sup>These focus areas were used by grantees at the time of our interviews, which were conducted from July 2011 to September 2011.

# Appendix III: Reported Legal Constraints on Holding Senior Corps Grantees Accountable

Statutory section	Programs affected	Description of legal constraint
42 U.S.C. § 5001(e)	Retired and Senior Volunteer Program (a Senior Corps program)	Beginning in fiscal year 2013, the competitive process to determine Retired and Senior Volunteer Program (RSVP) grantees must ensure that the number of volunteers in specific geographic areas will remain at least at the previous level, and a similar distribution of programs must be maintained. Additionally, beginning in 2013 the competitive process must ensure that "every effort" is made to minimize the disruption to volunteers.
42 U.S.C. § 5001(i)	Retired and Senior Volunteer Program (a Senior Corps program)	CNCS is required to continue funding RSVP programs that fail to meet performance measures for up to 12 months if a competition does not result in a new grantee.
42 U.S.C. § 5027(a)(2)	All Senior Corps programs	Funding reductions resulting from insufficient appropriations must be applied pro rata to all Senior Corps grants. (This pro rata requirement applies regardless of the grantees' performance.)
42 U.S.C. § 5052(a)	Programs under the Domestic Volunteer Service Act of 1973, which includes Senior Corps programs	If CNCS wants to deny an application for refunding, the grantee must be given (1) at least 75 days notice of the possibility of such denial and the grounds for the denial, and (2) an opportunity to show cause why such action should not be taken. If the grantee's application is denied for noncompliance with the grant or contract terms, the grantee must be given an opportunity for an informal hearing before an impartial hearing officer who has been agreed to by the grantee and CNCS. If CNCS wants to terminate funding for noncompliance with grant or contract terms, the grantee must be given reasonable notice and opportunity for a full and fair hearing.
42 U.S.C. § 12639(l) and (m)	All CNCS programs, including Senior Corps programs	If a grantee is failing to meet performance levels, CNCS must develop a corrective action plan and establish a period of correction for the grantee. For these low-performing grantees, CNCS must require the grantee to submit quarterly progress reports. In addition, if such a grantee has been receiving funding for less than 3 years, CNCS is required to provide technical assistance to address the performance problems. Termination or funding reduction of a grantee occurs only if the grantee continues to fail to meet performance measures after such a period of correction.

Source: CNCS officials, as confirmed by GAO review of relevant federal laws.

# Appendix IV: Comments from the Corporation for National and Community Service



February 10, 2012

Mr. George A. Scott, Director  
Education, Workforce, and Income Security Issues  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C.

RE: Comments and Response to Draft Report (GAO-12-310)

Dear Mr. Scott,

Thank you for the opportunity to review and comment on the draft report entitled "MEASURING PERFORMANCE: The Corporation for National and Community Service Faces Challenges Demonstrating Outcomes" (GAO-12-310). Overall, the draft report is balanced and the issues you raise are representative of the conversations we had with your team, as well as conversations we continue to have with our grantees and stakeholders. We appreciate the thoughtful analysis contained in the report and we are well underway with our efforts to address many of the issue outlined.

You will find below some minor edits to the draft which we felt could help add greater clarity to the content, and some comments outlined by page number. One issue to specifically note is SeniorCorps plans to seek statutory changes to address the legal constraints on their ability to introduce competition into their programs by the middle of February 2012. Thus, the statement in the draft report (repeated throughout) that CNCS officials "have not sought statutory changes" will be inaccurate if this report is released after the middle of February. We attempted to address this issue by qualifying the statement, however without knowledge of the report release date, we are unsure of the best language to use.

Again, we thank you for the opportunity to provide you with comments and you should feel free to contact me with any questions or concerns.

Sincerely,

John Kim,  
Director of Strategic Initiatives  
Corporation for National and Community Service

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# Appendix V: GAO Contacts and Staff Acknowledgments

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## GAO Contact

George A. Scott, Director, (202) 512-7215, [scottg@gao.gov](mailto:scottg@gao.gov)

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## Acknowledgments

In addition to the contact listed above, Bill Keller (Assistant Director), James Bennett, Susannah Compton, Elizabeth Curda, Alex Galuten, Kirsten Lauber, Sheila McCoy, Erin McLaughlin, Brittnei Milam, and Ashanta Williams made key contributions to this report.

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# Related GAO Products

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*Performance Measurement: Better Alignment to Strategic Goals and Data Verification Needed at the Corporation for National and Community Service.* [GAO-10-886](#). Washington, D.C.: July 28, 2010.

*Grants Management: Enhancing Performance Accountability Provisions Could Lead to Better Results.* [GAO-06-1046](#). Washington, D.C.: September 29, 2006.

*Corporation for National and Community Service: Better Internal Control and Revised Practices Would Improve the Management of AmeriCorps and the National Service Trust.* [GAO-04-225](#). Washington, DC.: January 16, 2004.

*Corporation for National and Community Service: Preliminary Observations on the National Service Trust and AmeriCorps.* [GAO-03-642T](#). Washington, D.C.: April 10, 2003.

*National Service Programs: Two AmeriCorps Programs' Funding and Benefits.* [GAO/HEHS-00-33](#). Washington, D.C.: February 15, 2000.

*Grant Programs: Design Features Shape Flexibility, Accountability, and Performance Information.* [GAO/GGD-98-137](#). Washington, D.C.: June 22, 1998.

*The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans.* [GAO/GGD-10.1.20](#). Washington, D.C.: April 1, 1998.

*National Service Programs: Role of State Commissions in Implementing the AmeriCorps Program.* [GAO/HEHS-97-49](#). Washington, D.C.: February 20, 1997.



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