

Alternative Evaluation Approach Guidance for AmeriCorps State and National Grantees

Evaluation requirements and need for an alternative evaluation approach

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. AmeriCorps State and National grantees receiving \$500,000 or more from CNCS are required to conduct an independent impact evaluation covering at least one program year. While rigorous impact evaluation is the only definitive way to demonstrate that changes in outcomes were caused by the AmeriCorps intervention, CNCS recognizes that the current state of the science in program evaluation is such that impact evaluations as defined in the CFR are not appropriate for all grantees. We have therefore created a process for grantees to request approval of an “alternative evaluation approach” from CNCS that would allow them to use a different type of evaluation design 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 lifecycle and position on the evidence continuum; as such, an impact evaluation as defined above may not always be appropriate. Approving an alternative evaluation approach in these circumstances allows CNCS to maintain evaluation rigor while recognizing that there are limited circumstances under which some flexibility will help us achieve the underlying purpose of the evaluation requirement, which is to demonstrate that our investments are making a difference.

Grantees requesting an alternative evaluation approach 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 Furthermore, the evaluation must meet all CNCS evaluation requirements not superseded by the approved alternative evaluation approach.

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.

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 alternative evaluation approach must provide the following:

- A written request for an alternative evaluation approach that describes the following:
 - a) The evaluation constraints faced by the program
 - b) Why the proposed approach is the most rigorous option feasible
 - c) How the proposed alternative approach will help the grantee build their evidence base or is otherwise necessary
- A written evaluation plan that includes, at a minimum, the required elements listed in the NOFO.

Grantees must submit a request for approval of an alternative evaluation approach during the grant application process, along with their evaluation plan, which is a requirement for all applicants under the NOFO. The evaluation plan must be consistent with the information submitted in the application. The request for approval of an alternative evaluation approach and evaluation plan will be reviewed by the CNCS Office of Research and Evaluation (R&E). The request will not be considered until the grant is approved for funding.

Requests submitted outside of the grant application process may be considered under limited circumstances.

R&E will consider the request for an alternative evaluation approach and the evaluation plan in consultation with the ASN program office. If needed, R&E may also follow up directly with the grantee to gather additional information needed in order to make a determination. Approval or denial will be determined by R&E.

If both the request for approval of an alternative evaluation approach and the written evaluation plan are approved by R&E, the grantee will be authorized to conduct an evaluation for that grant cycle as specified in their written evaluation plan. If the evaluation is carried out as planned, 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 reapplying for future funding.

Bases for approval of an alternative evaluation approach

(1) Structure of AmeriCorps program or grantee organization

AEAs are approved for structure when:

- The grantee demonstrates insurmountable challenges to forming a comparison group. In this case, CNCS anticipates that only certain program designs will be considered for approval of an alternative evaluation approach.
- 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 demonstrate how their program design differs significantly enough to meet the CNCS definition of new project described in 45 CFR § 2522.340. Grantees requesting an AEA on the basis of evaluation readiness must describe and document why it is not developmentally appropriate to conduct an impact evaluation. Grantees may either submit a narrative justification or may provide a copy of the completed [CNCS Evaluability Assessment Tool](#) with additional narrative explaining how the results of the assessment justify the request for an alternative evaluation approach.

(2) Member development

- Programs for which AmeriCorps member development is a primary or major objective, as reflected in their theory of change, may apply for approval of an alternative evaluation approach to implement an evaluation focused on member outcomes instead of community or service beneficiary outcomes. Such an approval will only be granted if member development is the program's primary or major objective and is specified as such in the theory of change.

- Both small and large grantees are required to request an AEA before conducting a member development evaluation.

(3) Timing

- Grantees may also request approval of an alternative evaluation approach if they are planning to conduct an independent impact evaluation that will not be completed during the current grant cycle and for which findings will not be available until the subsequent grant cycle. 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.
- Approval of an alternative evaluation approach for timing considerations is available for all grantees (including small grantees) and is not related to program design-based evaluation challenges.
- 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 is required to submit such findings in their evaluation report and no additional approval is needed.
- If no interim findings will be available in the current grant cycle due to the nature of the evaluation design and the articulated value in longer-term measurement and reporting, the grantee should request an approval specific only to the timing in which they will be reporting their evaluation findings to CNCS. Such a grantee will still be required to conduct an independent impact evaluation with a comparison group and will also be required to submit an implementation report during the current grant cycle.

(4) Replication

- Grantees may be eligible for 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 at least two experimental or quasi-experimental studies in contexts and with beneficiary populations similar to the ones in which the grantee is operating. Examples could include a specific site of a National Direct grantee for which evidence exists from other sites, or a grantee implementing the same intervention that has been rigorously evaluated by another AmeriCorps program. If such an approval is granted, the grantee must still conduct a well-designed implementation study during the current grant cycle.

Insufficient bases

- Expectations for conducting comparison group impact evaluations have been articulated in the CFR and grantees are expected to comply to the extent that they do not meet the criteria 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/National grantees receiving over \$500,000 are eligible to apply for approval of an alternative evaluation approach for any of the reasons outlined in the document. Grantees receiving

less than \$500,000 are eligible to apply for approval of an alternative evaluation approach for timing or member development.