

Approval of Alternative Evaluation Approaches for ACSN Grantees – Pilot Program Guidance to 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 pilot 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 (also known as a 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. The pilot program for approval of alternative evaluation approaches 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 must still use the most rigorous evaluation design that is feasible for their particular circumstances. Furthermore, the evaluation must still be conducted by an independent evaluator and must cover at least one program year. Examples of such rigorous designs are time series/interrupted time series, regression discontinuity, rigorous case studies with appropriate validity and reliability, and pre-test/post-test. This list may be revised and updated by CNCS as the state of program evaluation science evolves. 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.

Process for approving alternative evaluation approaches

AmeriCorps State/National grantees receiving over \$500,000 (those required to conduct an independent impact evaluation) and funded as a recompet in FY12 or later are eligible to apply for approval of an alternative evaluation approach through this pilot program. Grantees requesting approval of an alternative evaluation approach should submit a request for approval of an alternative evaluation approach and a current evaluation plan to their program officer by December 31, 2014. Evaluation plans should include, at a minimum, the required elements listed in the NOFO. The request should clearly explain: (a) the evaluation constraints faced by the program, (b) why the proposed approach is the most rigorous option feasible, and (c) how the proposed alternative approach will help the grantee build their evidence base or is otherwise necessary.

The request will be considered by the CNCS Research and Evaluation office in consultation with AmeriCorps State and National. If needed, CNCS may follow up directly with the grantee to gather more information about the program and its evaluation constraints. The Research and Evaluation office will

provide written justification of approval or denial of the request to the grantee and their program officer. This justification form will be kept with the rest of the grantee's records in eGrants.

If both the request for approval of an alternative evaluation approach and the written evaluation plan are approved, the grantee will be authorized to conduct an independent evaluation for that grant cycle as specified in their written evaluation plan. If the alternative evaluation is carried out as planned, the grantee will have met the evaluation requirements for that grant cycle.

Beginning in FY15, grantees will need to submit a request for approval of an alternative evaluation approach during the grant application process, along with the required submission of their evaluation plan. The evaluation plan must be consistent with the information submitted in the competitive funding application and in the request for approval of an alternative evaluation approach.

Bases on which approval of an alternative evaluation approach may be granted

1. Structure of AmeriCorps program or grantee organization: CNCS anticipates that only certain program designs will qualify for approval of an alternative evaluation approach based on the structure of the program or organization. These will likely include capacity-building programs, certain environmental/conservation programs, and disaster services programs. For some program designs, it is extremely difficult to conduct an impact evaluation that compares outcomes for service beneficiaries or members to outcomes for a comparison group because some programs face insurmountable challenges to forming a comparison group.
2. Member development: Programs for which AmeriCorps member development is a primary or major objective, as reflected in the 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.
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 the grantee can articulate the value in longer-term measurement and reporting or because the outcomes of interest follow natural cycles that are not aligned with the grant cycle.
4. Approval of an alternative evaluation approach for timing considerations is available for all grantees and is not related to program design 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 request for approval of an alternative evaluation approach 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.
5. 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.

Unallowable considerations

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, and 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.

Questions about the alternative evaluation approach pilot program and the approval process can be directed to Carla Ganiel at cganiel@cns.gov