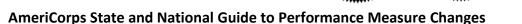
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# 1. General Rule

Any performance measure change should be for the purpose of improving the performance measures. This could mean improving the measure itself or the program's overall approach to performance measurement. Improving the performance measures might include, but is not limited to: creating or revising performance measures to more accurately reflect a program's theory of change, bringing a performance measure into alignment with National Performance Measure Instructions, providing clearer definitions of key terms, adjusting interventions/data collection plans/instruments to be more robust, etc. For more information about high quality performance measures, please see the Quality Performance Measures course in the CNCS Performance Measures Core Curriculum (http://www.nationalservice.gov/resources/performance-measurement/training-resources#Quality PM). Changes that do not improve the quality of the performance measures should not be approved. Changes for the sole purpose of lessening burden on the program, without improving the quality of the measure, should not be approved. A program reducing targets for the sole purpose of meeting their targets would not be an acceptable change.

For example: A request to stop using National Performance Measures simply to reduce the burden of compliance with the Performance Measures Instructions would not be an acceptable change.

For example: A program realizes mid-year that fewer beneficiaries will demonstrate positive change than expected and proposes adjusting their performance measure targets via an amendment. This is not an acceptable change because the sole purpose of the change is to allow the program to meet targets. In cases like this where changing targets is not allowed, the program will still have an opportunity to provide an explanation for unmet targets in the GPR.

# 2. Consideration for State Commissions: Formula v. Competitive Subgrants

# Formula

State Commissions have discretion when allowing formula subgrantees to adjust their performance measures via an amendment. Commissions should utilize the considerations in this document to guide their discussion with subgrantees and are encouraged to discuss formula performance measure changes with their CNCS Program Officer. The Commission is responsible for reviewing and approving the changes via an amendment, and the CNCS Program Officer will certify the amendment. Note that formula subgrantees utilizing National Performance Measures must follow the selection rules as specified in the National Performance Measure Instructions. CNCS Program Officers will review formula performance measure alignment prior to certification, and misaligned National Performance Measures will not be certified.

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### Competitive

Commissions and CNCS must both approve adjustments to competitive subgrantees' performance measures. Changes in performance measures require an amendment to the application in eGrants which includes amending the subapplication, the Commission's review and approval of the subapplication, and the CNCS Program Officer's review and approval of the subapplication.

### 3: Changing Performance Measures

### **Considerations:**

# Under what circumstances should CNCS and/or the Commission approve a program's request to change a performance measure?

- 1. See General Rule section above. Performance measure changes should only be approved if they are for the purpose of improving the quality of the performance measures.
- 2. During the program year:
  - In most cases the applicant will be held to the performance measures as outlined in their approved grant application. The clarification or revision period during the application process was the correct time for the applicant to fix most performance measure issues.
  - Performance measure changes are allowable to correct certain types of applicant error (see "Common Performance Measure Issues" below). For example, if it becomes evident that the program did not comply with National Performance Measure alignment instructions or definitions, the program should correct their measures at this time.
  - Other types of changes may be allowable if they will help the program to meet the General Rule criteria, and if there is a compelling reason why they should not wait until the next continuation/recompete application. For example, if an education program was notified at the beginning of the school year that the assessment test was changing for the entire district, the performance measures may need to be updated. The assessment test and indicators are different than what is in the approved application, so an amendment is needed.

Commissions and programs should consider how the performance measure change will affect reporting for the year. For example, if a program changes to a more robust data collection tool mid-year, but was required to administer a pre- and post-test, it is likely that program will have to report '0' for that outcome. Mid-year performance measure changes should be discussed with the CNCS Program Officer to determine how the change would affect reporting for the year. In the case of instrument changes, it is generally advised that programs spend the remainder of the year testing their new instrument before adopting it in the next grant year; however, there may be some exceptions where it makes sense to begin using a new instrument immediately.

- 3. In continuation applications:
  - Performance measure changes during the continuation application process are generally allowable if they help the program meet the General Rule criteria and/or correct certain types of applicant error (see "Common Performance Measure Issues" below). The applicant must provide a compelling reason (adjusted interventions/instruments due to programmatic learning curve, significant change in program circumstances, allowable program design change, etc.). This reason must be documented in the continuation narrative section of the application. Programs should have solid justification and data to inform what is realistic and ambitious.
  - Reviewers should ensure the performance measures still reflect the primary intervention(s) of the program and still present a compelling reason for funding. For example, if the performance measures are now in a different focus area or the outcomes are different in scope, the changes should not be



approved unless the program is still measuring its primary intervention and the outputs and outcomes still reflect a worthwhile investment.

- The need for and significance of revisions may depend on the experience level of the program. For example, a new program or a program implementing recommendations from an evaluation may need to revise their intervention design or dosage, which may impact performance measures. An experienced program that is not proposing significant changes to its program design would generally be expected to maintain the performance measures that were approved when they recompeted, unless performance measure errors or problems in performance measure quality have subsequently been identified.
- 4. In recompete applications:
  - Performance measure changes during the recompete application process are generally allowable if they help the program meet the General Rule criteria. The focus should be on what is ambitious and realistic for this program given their past performance (including recommendations from an evaluation, if applicable) and proposed changes in the recompete application. Programs should have solid justification and data to inform what is realistic and ambitious. Reviewers should ensure the performance measures reflect the primary intervention(s) of the program, present a compelling reason for funding, and follow all required Performance Measure Instructions.

#### **Common Performance Measure Issues:**

CNCS has created the following chart which highlights common performance measure issues and recommended actions. The chart is intended as direction for CNCS staff and State Commissions.

Performance Measure Issue	Recommended Actions	Data Reporting Considerations
Incorrect alignment of National Performance Measures (do not follow required selection rules)	<ul> <li>Require that the measures be corrected as soon as possible (pre-award or anytime during the program year).</li> <li>Provide training and technical assistance to program around improving performance measure quality.</li> </ul>	Allow performance measure actuals to be reported on the Grantee Progress Report (GPR) as long as the numbers reported for the individual outputs and outcomes were collected using valid instruments/protocols/definitions. If not, instruct the program to report zeroes.
National Performance Measures being used in the wrong context (e.g. beneficiary- focused national measures being used to report member- focused outputs/outcomes)	<ul> <li>Require that the measures be corrected as soon as possible (pre-award or anytime during the program year).</li> <li>Provide training and technical assistance to program around improving performance measure quality.</li> </ul>	Do not allow performance measure actuals to be reported on the GPR. Instruct the program to report zeroes instead.



Poor-quality applicant- determined measures (outcomes that do not measure a change in knowledge, attitude, behavior, or condition; misalignment of outputs and outcomes; measures that duplicate national measures; etc.)	<ul> <li>Provide training and technical assistance to program around improving performance measure quality.</li> <li>Require that the measures be improved in the next continuation/recompete application. Programs may propose to make changes sooner if the changes meet the General Rule criteria.</li> </ul>	Allow performance measure actuals to be reported on the GPR as long as the numbers reported for the individual outputs and outcomes were collected using valid instruments/protocols/definitions. If not, instruct the program to report zeroes.
Minor errors in National Performance Measures that do not involve incorrect use of the measure (e.g. typos or mistakes in output and/or outcome targets)	<ul> <li>Provide training and technical assistance to program around improving performance measure quality.</li> <li>Require that the measures be corrected in the next continuation/recompete application.</li> </ul>	Allow performance measure actuals to be reported on the GPR as long as the numbers reported for the individual outputs and outcomes were collected using valid instruments/protocols/definitions. If not, instruct the program to report zeroes.
Low quality data collection instrument (e.g. instrument is not valid or reliable, or does not comply with the performance measure instructions)	<ul> <li>Provide training and technical assistance to program around improving performance measure quality.</li> <li>Require the applicant to change the instrument in the next grant year and document this change in the continuation/recompete application. If the program wishes to change the instrument mid-way through the year, they may do so; however, due to issues such as pre/post-test matching, they may still be unable to report actuals on the GPR. In general, it is wiser for applicants to spend time identifying and testing a high quality instrument that they will be ready to use in the next year rather than make a quick change mid-year.</li> </ul>	Do not allow performance measure actuals from the instrument to be reported on the GPR. Instruct the program to report zeroes instead.

# 4: Examples of Performance Measure Target Changes

Please note: The below examples relate only to <u>target</u> changes for performance measures.

### EXAMPLES

Under what circumstances should CNCS and/or the Commission approve a program's request to change performance measure targets?

1. During the program year:



- Example of <u>unallowable</u> change: A program was awarded 28 full-time slots, 14 serving in a community outreach capacity and 14 serving as nutrition educators. After the award was made, the program discovered that two sites, each with one member, needed nutrition educators instead of community outreach members and would like to adjust their targets to reflect changes in the activities of the two members. In this case, changes in the activities of two members is not a significant program design change and does not warrant revising the targets at this point. The program is not allowed to make changes to their performance measures in this case, but can use the GPR as the opportunity to explain why targets were not met. The targets can be revised in the next continuation/recompete application.
- Example of <u>allowable</u> change: A program has two components, an early childhood literacy program and a middle school after school program. After the grant was awarded, but before members were recruited, the program learns that match funding has been cut for the middle school program, which accounts for 25% of the program's MSYs. The program has a waiting list of students for the early childhood program and can secure additional match to support that program component, so all members will now serve in the early childhood program. This is a significant change in program design, and the program should change its targets for the early childhood program and delete the after school performance measure since it would not make sense for the program to have a performance measure for an activity they were no longer doing.
- Note: In these two examples, the major difference is the significance of the change. Commissions who are not sure whether a proposed change is significant enough to require an amendment should consult with their CNCS Program Officer. An amendment to change performance measures in this case will likely also require narrative explanation of the program design change.
- Example of <u>unallowable</u> change: A program only enrolled 15 out of 20 full-time members and therefore will see a 25% reduction in productivity (outputs and outcomes) for the year. Adjusting performance measure targets due to low enrollment is not permitted because this change would not be for the purpose of improving the performance measure (i.e., it would not follow the General Rule criteria).
- Example of <u>allowable</u> change: The Commission discovers the program did not use the correct definition of mentoring as stated in the National Performance Measure Instructions and therefore the number of actual mentor relationships is less than originally proposed. In this case, the program should be allowed to reduce the target mid-year as part of the required corrections to the performance measure.
- 2. In continuation and recompete applications:
  - Example of <u>unallowable</u> change: A program with no program design changes is proposing to decrease its performance measure targets despite its demonstrated ability to meet those targets in previous grant cycles. The program does not provide a compelling explanation of why this change is necessary.
  - Example of <u>allowable</u> change: A program is proposing an expansion and would like to increase targets in proportion to the expansion request.

# 5: Procedure for Changing Performance Measures Pre-Award or Mid-Year

Please note: The below procedure relates only to pre-award or mid-year changes. Changes in performance measures during continuation or recompete applications should be handled according to the normal CNCS/Commission application review process.

**Please note:** Amendments interfere with Grantee Progress Report (GPR) submission and review. Amendments on the same grant year as the GPR should not be initiated when there is an open GPR (i.e., when a GPR is in the process of being completed by a grantee or is currently under review by CNCS).

### Recommended procedure for reviewing a request to change performance measures pre-award or mid-year:



- 1. Program proposes the change.
- 2. CNCS/Commission asks program to address each question below in writing.
- 3. CNCS/Commission reviews the program answers, applying the considerations above.
- 4. For competitive applications, the CNCS Program Officer will review the changes made to the performance measures and may have further questions or request additional clarification during this process.
- 5. If the proposed change is approved by the Commission and/or CNCS Program Officer, the change (pre-award) or amendment (mid-year) can be initiated. Documentation of the proposal and approval should be maintained.

### Questions programs should address when proposing to change their performance measures:

The program should provide the answers to these questions in their change request. Documentation of the proposal and approval should be maintained.

- 1. State the grant year and application ID to be amended.
- 2. Please describe the proposed change and why the change is necessary. .
- 3. Please describe how the change will improve or strengthen the program's performance measurement.
- 4. Please describe how the changes are reasonable. Provide backup information as necessary.
- 5. Please describe how the changes are ambitious. Provide backup information as necessary.
- 6. For mid-year changes: Please describe whether this change will affect reporting for the year. Will '0' need to be reported for an output or outcome because the intervention, definition, or data collection has changed? If the change will affect reporting for the year, outline how the change will affect reporting and what actions are required as a result.

## **Questions Commissions/CNCS should consider as they review the program request:**

- 1. Will the change improve or strengthen the program's performance measurement?
- 2. Is the program's issue described under the Common Performance Measure Issues section? If so, is the guidance in this section being followed correctly?
- 3. Is the proposed change appropriate given the status of the program in their funding cycle?
- 4. Is the program design change described (if applicable) significant and acceptable?
- 5. Based on program past performance and current capacity, are the changes both ambitious and realistic?
- 6. For target changes: Is there a legitimate reason for the program to make the change other than the program's inability to meet the current target?
- 7. For mid-year changes: Will the change affect reporting for the year? If so, how will the Commission/program ensure data quality in reporting?
- 8. Is there an open Grantee Progress Report (for submission or review) for this grant? If so, the amendment must not be started until after the report is closed.

After appropriate consideration and approval for the proposed performance measure change and type of grant, follow the regular amendment procedure to update the performance measures.

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