

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

Background information

AmeriCorps 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 AmeriCorps with their next recompute evaluation. Grantees receiving \$500,000 or more per year from AmeriCorps 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, AmeriCorps recognizes that impact evaluations as defined in the CFR are not appropriate in all cases. AmeriCorps 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. AmeriCorps has therefore created a process for grantees to request approval of an Alternative Evaluation Approach (AEA) 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, AmeriCorps 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 AmeriCorps 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 AmeriCorps 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 AmeriCorps 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 specifies the following:
 - The AEA type(s) requested
 - 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 referenced in the Notice of Funding Opportunity.

Requests for AEA approval should typically be submitted as part of the recompetit grant application. Requests submitted outside of the recompetit grant application process may be considered under limited circumstances; such requests must be submitted as email attachments to EvaluationPlans@cns.gov using the [AEA Request Form](#).

AmeriCorps will assess the request for an Alternative Evaluation Approach and the evaluation plan. 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, AmeriCorps 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 AEA review form and 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 recompetit for future funding.

Bases for approval of an Alternative Evaluation Approach

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

Grantees approved for this AEA type are permitted to conduct a non-impact evaluation

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. AmeriCorps 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 (1) the challenges to forming a comparison group are not surmountable due to the nature of the program design, and (2) the proposed alternative approach is the most rigorous option feasible
- 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 (1) how their program design has changed significantly enough that it no longer meets the definition of “same project” (45 CFR § 2522.340), and (2) why the proposed alternative approach is the most rigorous option feasible
 - Grantees requesting an AEA on the basis of evaluation readiness must explain (1) why it is not developmentally appropriate for the program to conduct an impact evaluation at this time and (2) why the proposed alternative approach is the most rigorous option feasible. If desired,

grantees may provide a copy of a completed [Impact Evaluability Assessment Tool](#) and explain how the results of the assessment justify the request for an Alternative Evaluation Approach.

(2) Previous impact evaluation (Large grantees only)

Grantees approved for this AEA type are permitted to conduct a non-impact evaluation

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 recompetete 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 recompetete 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 approved for this AEA type are permitted to conduct a non-impact evaluation

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 recompetete 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 recompetete 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 approved for this AEA type are permitted to submit an implementation report describing the progress they have made to date in conducting their evaluation

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 recompile 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, (2) explain why it will not be possible to submit an interim evaluation report with their recompile application that would meet their evaluation requirements, and (3) specify the timeframe in which they will submit their final evaluation report to AmeriCorps.
- 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.

(5) Funding Threshold (Large grantees only)

Grantees approved for this AEA type are permitted to conduct an internal non-impact evaluation

Grantees may request approval of an Alternative Evaluation Approach if the total awarded federal share of their budget averages under \$1 million per year for the full life of the grant. The total awarded federal share includes all AmeriCorps funding (initial award plus any supplemental funds) awarded to support the program.

- Grantees requesting this AEA type must state their total awarded or requested federal share for each year in their current grant cycle. These figures will be verified by AmeriCorps. **In order for an AEA request of this type to be approved, the official eGrants record must confirm that the average yearly AmeriCorps funding awarded for this grant cycle is less than \$1 million per year.**
- If additional funding is awarded after AEA approval that pushes the average yearly federal share for the grant above \$1 million per year, the AEA will be rescinded.
- If AEA approval is granted, the grantee is encouraged to conduct the most rigorous evaluation feasible for their program. The use of an external evaluator is encouraged but not required for this AEA type.

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.