



Comment of The Scaffold Initiative

To: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Desk Officer for the Corporation for National and Community Service

Copy: AmeriCorps Seniors, Corporation for National and Community Service (AmeriCorps)

Re: AmeriCorps Seniors Application Instructions, Progress Reporting, Independent Living and Respite Surveys

OMB Control No. 3045-0035 · ICR Ref. 202606-3045-004 · FR Doc. 2026-19641 (91 FR 60942)

Date: October 23, 2026

I. Interest of the Commenter

The Scaffold Initiative is a Wyoming-incorporated 501(c)(4) social welfare organization focused on workforce equity and the capacity of community-based organizations. The sponsors who complete these forms, the nonprofits and local governments that run RSVP, Foster Grandparent, and Senior Companion projects, are the kind of organizations we work to support. This month we also commented on two Department of Veterans Affairs collections (VA Forms 22-10299 and 22-10282), urging that agencies record consent and outcomes at the point of collection. The same principle applies here, to older adults and the family members who care for them.

We support this collection. Our comments draw on the full Information Collection Request (ICR) package on [reginfo.gov](https://www.reginfo.gov) and AmeriCorps' own research on these surveys.

II. What This Revision Does Well

- **One report instead of two.** Folding the Progress Report Supplement into the Project Progress Report removes 1,250 burden hours a year. Both 60-day commenters, a Senior Companion program director and the National AmeriCorps Seniors Association (NACSA), supported it. For small sponsors, that is time returned to service.
- **A survey review is under way.** AmeriCorps committed to review the Independent Living and Respite Surveys in 2023 (88 FR 44290, July 12, 2023). NACSA reports that AmeriCorps has funded the University of Maine to revise them and that “a draft is nearly ready for review.” We offer our suggestions as input to that work.

III. Summary of Suggestions

1. **Build on AmeriCorps' 2014 survey study.** AmeriCorps commissioned a careful review of these surveys, and its recommendations give the revision a ready-made starting point.
2. **Consider questions that can show change over time,** using short items that national aging surveys already use.
3. **Welcome respondents with a short plain-language notice,** which also completes the required elements and updates the control number.
4. **Recognize the clients and caregivers who answer** in the burden estimate, alongside sponsors.

5. **Share results with sponsors and the public**, so local projects can see and show what their volunteers achieve.

IV. Suggestions

1. Build on AmeriCorps’ 2014 survey study

In 2014, JBS International studied these surveys for AmeriCorps across 3,048 client and 656 caregiver responses. It found the data “appeared to be reliable and valid,” and drew on grantees, experts, and the data to suggest improvements (Pratt et al., *SCP Independent Living Performance Measurement Survey: Process, Rationale, Results, and Recommendations*, September 2014). Several match what sponsors are asking for today:

2014 suggestion (JBS for AmeriCorps)	Why it fits the revision
Add a “not applicable” option (SI5)	A program director wrote in August 2026 that “many of the current survey questions do not represent the services that our volunteers are providing.”
Create a version for proxy respondents who answer for a client (SA5)	In 2023, Senior Companion directors noted that “it is often the caregiver of the client that completes this survey” for clients with dementia.
Combine the two overall satisfaction items, which overlap (SI1)	One item instead of two shortens each survey.
Consider dropping “I am eating regularly scheduled meals,” which loaded on more than one factor (SI3)	Also shortens the client survey.
Open with strengths rather than with what respondents lack (SI7)	Both surveys now begin with “I feel less lonely.”
Define “respite” on the caregiver survey (SI8)	Helps first-time respondents.

We suggest that AmeriCorps share this list with the University of Maine team. The proxy version may matter most: it lets a caregiver report on services to a client with dementia without being asked about the client’s feelings, which a proxy can’t know.

2. Consider questions that can show change over time

Each scored item reads “Because I have an AmeriCorps Seniors volunteer. . .” followed by a statement to agree or disagree with. That format is common, and survey research has found that questions with answer choices specific to the item tend to produce higher-quality answers than agree or disagree questions (Saris, Revilla, Krosnick & Shaeffer, *Survey Research Methods* 4(1), 2010). The 2014 study noted “possible ceiling effects,” with some respondents answering “strongly agree” to every item. AmeriCorps’ 2017 caregiver study pointed to a related opportunity: a single survey after service “did not measure whether and how respite services might be associated with a change.” AmeriCorps’

own performance measure guidance already encourages the next step: “when possible, pre-post assessments should be utilized” (FY 2024 Senior Companion Program Appendix B, measure H14).

Short, public items that national aging surveys already use could help:

What to measure	Item to borrow
Loneliness (client)	Three-item loneliness scale from the Health and Retirement Study: how often do you feel you lack companionship, feel left out, feel isolated (hardly ever, some of the time, often) (Hughes et al., <i>Research on Aging</i> 26(6), 2004)
Support (client and caregiver)	CDC’s Behavioral Risk Factor Surveillance System: “How often do you get the social and emotional support that you need?” (always to never)
Caregiver strain	The Administration for Community Living’s caregiver questionnaire (National Survey of Older Americans Act Participants, OMB 0985-0023): how often caregiving prevents “having enough time for yourself” (always to never)

We suggest that the revised surveys (a) consider items like these, asked when a client or caregiver starts services and again about a year later; (b) turn the errand items (groceries, medical appointments) into a short checklist of help received, so each person answers only about services they get; and (c) keep one overall “because of your Senior Companion” item to capture the change people perceive. Because these items match national surveys, sponsors could also compare their clients with older adults nationally, at no added burden.

3. Welcome respondents with a short plain-language notice

The survey files in this package carry an earlier header, “OMB Control Number: [3045-XXXX]” with “Expiration Date: 10/31/2024,” and a brief note on confidentiality and skipping questions. A few more lines would tell respondents why AmeriCorps asks, how answers are used, how long the survey takes, and that answering is voluntary, which completes the elements OMB’s rules list for every collection (5 CFR 1320.8(b)). For older adults, this notice is also how the program records consent at the moment of collection. **We suggest** a box like this at the top of each survey, in 14-point type, which federal health literacy guidance suggests for older readers (HHS Office of Disease Prevention and Health Promotion, *Health Literacy Online*, section 3.3):

Why we ask: Your answers help your Senior Companion program and AmeriCorps learn whether visits help people stay connected and independent.

How we use them: The program adds up answers from everyone it serves and reports totals to AmeriCorps. Please don't write your name.

Time: About [X] minutes. You can skip any question.

Your choice: Answering is up to you. Your services won't change either way.

OMB No. 3045-0035, expires [date]. You don't have to answer unless this number is shown. To comment on the time this takes, write to [address].

4. Recognize the clients and caregivers who answer

The package lists the surveys within one sponsor-level collection, with not-for-profit institutions as the affected public. The time clients and caregivers give is also burden under OMB's rules (5 CFR 1320.3(b)(1)), and Appendix B describes the surveys as a "mandatory survey instrument" for Senior Companion projects, which brings them within the collection AmeriCorps sponsors (5 CFR 1320.3(d)). The supporting statement describes them more loosely, as "a tool for grantees if they wish to use them." **We suggest** that AmeriCorps:

- **List each survey as its own information collection**, with "Individuals or households" as the affected public and "Voluntary" as the obligation. The Federal Program Inventory reports that Senior Companions served 13,374 older adults and 3,074 caregivers in 2023, so up to about 16,000 people may receive a survey each year.
- **Estimate sponsor time to run the surveys** for the projects that use them: 172 Senior Companion awards in AmeriCorps' FY 2026 awards data, plus any RSVP projects that choose the surveys.
- **Count small sponsors as small entities.** Under the Paperwork Reduction Act, small entities include small nonprofits and local governments of fewer than 50,000 people (44 U.S.C. 3506(c)(3)(C); 5 U.S.C. 601(6)), and many sponsors fit. The ICR currently lists none. Counting them would credit this revision's consolidation as the small-entity burden reduction it is.

5. Share results with sponsors and the public

Sponsors collect these surveys, and AmeriCorps reports totals in its budget justification. We could not find published results for the two survey-based outcome measures (H9A for clients, H14 for caregivers), and data.americorps.gov, which hosts awards and member survey data, could be a natural home for them. A sister program offers a model: the Administration for Community Living publishes its participant survey instruments and data online, and uses them to "provide national benchmark information" (89 FR 18413, March 13, 2024). The 2014 study also suggested helping sponsors share results with "stakeholders and potential funders" (C4). **We suggest** that AmeriCorps publish annual H9A and H14 totals with response counts on data.americorps.gov, and return a one-page summary to each sponsor that compares its results with the national figure.

V. Conclusion

This revision lowers the reporting burden on sponsors, and the survey review is a chance to do the same for the clients and caregivers who answer, while making their answers more useful. AmeriCorps already has a strong foundation for that work: its own 2014 study, questions proven in national surveys, and a sister agency's model for sharing results. The Scaffold Initiative would be glad to help test a revised survey with community partners who serve older adults.

Respectfully submitted,

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Appendix: Clean-up Edits

Small items we noticed while reading the package, offered in case they help the final submission.

Where	Suggested edit
Supporting statement	Item 1 says survey data is reported “in the progress report and PRS,” which this revision eliminates; use “progress report.” Item 12’s burden table uses \$67.30 an hour, while the note uses \$67.39 ($5,000 \times \$67.39 = \$336,950$); use \$67.39.
ICR record	Answers “No” to “Does this IC contain surveys...?”; the package contains two, so answer “Yes.” The agency contact is a Bureau of Indian Affairs address (bia.gov); use the AmeriCorps Seniors contact named in the notice.
Notice vs. ICR	The notice lists 1,250 annual responses and includes State, local, and Tribal governments; the ICR lists 5,000 responses and only not-for-profit institutions.
Progress report instructions	The uploaded file is dated 2021, with an eGrants facsimile dated 7/19/16, and doesn’t show the questions moved from the PRS. Upload the revised instructions.
Progress report frequency	The instructions describe a semiannual PPR Lite and an annual PPR; the burden estimate counts one progress report a year. Confirm the PPR Lite is counted.
Both surveys	“a AmeriCorps Seniors volunteer”; question 1 refers to “the past 4 weeks” and asks about “a typical week”; “one hour on Monday with and two hours.” Respite survey: “respite care you has affected”; “I am able find time.”
FY 2024 Appendix B, measure H14	A caregiver social support measure says to use an instrument “capable of measuring changes in food security.” Use “social support.”

AI Disclosure: This comment was prepared with the assistance of Claude (Anthropic), which was used for research synthesis, drafting, and citation verification. All substantive positions, recommendations, and strategic judgments are those of The Scaffold Initiative. Facts come from the ICR package on reginfo.gov and AmeriCorps sources, as of October 23, 2026.