


**Office of Inspector General  
Corporation for National and  
Community Service**

**EVALUATION OF THE  
NATIONAL CIVILIAN COMMUNITY CORPS (NCCC)  
PROGRAM**

**OIG REPORT 17-05**

Office of Inspector General

Corporation for  
**NATIONAL &  
COMMUNITY  
SERVICE** 

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**This report was issued to Corporation management on December 5, 2016. Under the laws and regulations governing audit follow-up, the Corporation is to make final management decisions on the report's findings and recommendations no later than June 5, 2017, and complete its corrective actions by December 5, 2017. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.**



December 5, 2016

TO: Wendy Spencer  
Chief Executive Officer

Gina Cross  
Acting Director, AmeriCorps\*NCCC

FROM: Stuart Axenfeld /s/  
Assistant Inspector General for Audit

SUBJECT: Office of Inspector General (OIG) Final Report 17-05: *Evaluation of the National Civilian Community Corps (NCCC) Program*

Attached is the final OIG Report 17-05: *Evaluation of the National Civilian Community Corps (NCCC) Program*. Under the Corporation's audit resolution policy, a final management decision on the findings and recommendations in this report is due by June 5, 2017. Notice of final action is due by December 5, 2017.

If you have questions or wish to discuss the report, please contact Deb Jeffrey, Inspector General, at (202) 606-9366, or [D.Jeffrey@cncsoig.gov](mailto:D.Jeffrey@cncsoig.gov); or me at (202) 606-9360, or [S.Axenfeld@cncsoig.gov](mailto:S.Axenfeld@cncsoig.gov).

Attachment

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**EVALUATION OF THE  
NATIONAL CIVILIAN COMMUNITY CORPS PROGRAM**

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## REPORT HIGHLIGHTS

### Why We Did This Study

The AmeriCorps National Civilian Community Corps (NCCC) is the only residential program operated by the Corporation for National and Community Service (CNCS). Enrolling up to 1200 members aged 18-24, NCCC offers an intense, team-based ten months of service.

Many of NCCC's activities duplicate those of grantees in other programs administered by CNCS that cost significantly less per member.

CNCS's Office of Inspector General (OIG) conducted this evaluation to assess the cost-effectiveness of NCCC's program vis-à-vis other CNCS programs with comparable activities, as well as other aspects of its performance. The evaluation focused on FYs 2012 and 2013, supplemented with limited information for FY 2014.

### What We Found

- Services performed by NCCC cost the taxpayers four to eight times more than the same services by CNCS's other AmeriCorps programs. Each member's ten months of service costs \$ 29,674 (for FY 2014), more than a year's tuition, room and board at a public university; for that sum, four individuals could obtain two-year community college degrees. Yet, despite this substantial investment, NCCC alumni achieve no better long-term outcomes than alumni of AmeriCorps programs that cost a fraction of that amount.
- NCCC is not meeting its enrollment capacity and suffers high attrition. In recent years, as many as 27 percent of NCCC members did not fulfill their ten-month service commitments. By contrast, AmeriCorps State and National (ASN) is oversubscribed, and its attrition rates are lower and declining. Moreover, NCCC lacks an effective strategy to recruit and retain disadvantaged youth, as required by statute.
- NCCC does not assess programmatic performance objectively or by campus.
- NCCC's disaster deployments are inefficient, in that teams may be brought from distant locations, bypassing available teams nearby.
- NCCC can do more to leverage the training of its members by improving pathways to employment and volunteering for alumni.

### What We Recommend

To maximize the impact of national service, CNCS leadership and the Congress should re-evaluate the appropriate balance between NCCC and other programs that cost the taxpayers substantially less for comparable service activities, and right-size NCCC accordingly. NCCC should develop a comprehensive recruitment and retention program that does not depend on other Federal programs to refer applicants and provide better support for members experiencing difficulties. The programmatic performance of campuses needs to be assessed objectively, to promote accountability and sharing of successful strategies. Proximity and cost need to be more important in determining which teams will respond to disasters. Given the skills and training that NCCC members receive, the program could improve member outcomes through additional efforts to connect alumni to post-service employment and volunteer opportunities.

## I. INTRODUCTION AND BACKGROUND

Founded in 1993, the AmeriCorps National Civilian Community Corps (NCCC) is the only residential program operated by the Corporation for National and Community Service (CNCS or the Corporation). The program is modeled after the Civilian Conservation Corps of the New Deal and aspects of the military.<sup>1</sup> NCCC has a dual mission: to provide services that strengthen communities and to develop leaders.

NCCC's goal is to enroll 1,200 individuals between the ages of 18-24, who serve full-time for ten months. With the passage of the Edward M. Kennedy American Serve Act in April 2009, the program became required to enroll 50 percent of its members from disadvantaged backgrounds. NCCC has made progress towards that goal; in FY 2014, approximately 40 percent of NCCC members came from such circumstances, the highest level achieved.

NCCC members undertake projects that fall into five broad categories: disaster response and recovery; infrastructure improvement<sup>2</sup>; environmental stewardship and conservation; energy conservation; and the catch-all category of urban and rural development. Members are assigned to one of five campuses — Denver, CO (Southwestern); Sacramento, CA (Pacific); Baltimore, MD (Atlantic); Vicksburg, MS (Southern); and Vinton, IA (North Central)—and complete service projects in their respective regions. Each project is typically six to 13 weeks long, and some, referred to as spikes, require members to work and lodge away from their campus. Members are organized into teams of eight to 12 individuals, under the supervision of a Team Leader, who is approximately the same age as the members. On campus, the members live together in dormitories or barracks. The program is physically intense, with long hours and sometimes rough conditions. Members are subject to random drug testing.

In return for their intensive national service, NCCC members receive a living allowance of \$400 per month (\$1,250 for team leaders), housing, clothing suitable to their service activities, a food allowance to be used for group meals, and limited medical and childcare benefits. Upon successful completion of their service terms, members become eligible for an Eli Segal Education Award, currently \$5,775. Before beginning their first service project, members complete training in CPR, first aid, public safety and other specialized skills, and they receive substantial additional training throughout their service terms, both project-specific and for personal development. Certain members are selected to receive highly specialized training in such areas as wildfire suppression.

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<sup>1</sup> This evaluation focuses on “traditional” NCCC and does not include FEMA Corps, a partnership between CNCS and the Department of Homeland Security’s Federal Emergency Management Agency (FEMA) launched in 2012 for disaster management. FEMA Corps members are dedicated to FEMA deployments in areas of logistics, disaster survivor assistance, individual and public assistance, and recovery.

<sup>2</sup> Infrastructure improvement consists of projects that contribute to the safety and well-being of community members through repair or construction of physical facilities. Examples of projects include building wheelchair ramps, constructing or renovating community centers, assembling playgrounds, and repairing and painting public facilities.

During the period FY 2012 – FY 2015, NCCC's appropriation has ranged from \$31.9 million to the current \$30 million.<sup>3</sup> These figures do not include the cost of members' education awards.

The legislation authorizing NCCC requires CNCS to conduct periodic evaluations of the program, including a comparison of the effectiveness of its program model vs. the models of other CNCS programs, cost-effectiveness, effectiveness in delivery of services, and promotion of civic engagement. 42 USC §§ 12624 and 12639. CNCS has conducted certain longitudinal studies of national service participants and last year completed a study of the effect of national service participation on alumni of AmeriCorps State and National, Volunteers in Service to America (VISTA) and NCCC. It is currently in the final stages of another study on the same subject. We are not aware of any studies comparing the models of these programs or their cost-effectiveness in the delivery of services to communities.

#### **A. Disaster Response Activities of NCCC and CNCS Grantees**

Disaster response and recovery is a core area of service across CNCS programs, and NCCC participates in responding to wildfires, floods, hurricanes, tornados and man-made disasters. CNCS often highlights these accomplishments in its public reports about NCCC, describing it as a “force multiplier” working with local organizations to coordinate and manage the large numbers of episodic volunteers who frequently appear in the wake of major disasters. According to CNCS, since 2000, more than 15,000 AmeriCorps NCCC members from across the country have served more than 5.4 million hours on 2,042 disaster service projects. The Corporation reports that NCCC members completed 403,444 service hours in disaster response and recovery in fiscal year (FY) 2013, and an additional 274,880 in FY 2014. This included continued recovery efforts in Joplin, Missouri and in the Atlantic states following Hurricane Sandy, and resulted in the delivery of an estimated 1.7 million meals in disaster-stricken areas across the nation to help feed those in need. In FY 2012, NCCC participated in disaster response and recovery efforts in 45 states, which included continued recovery efforts related to Hurricanes Irene and Isaac and support in addressing wildfires in Colorado. NCCC receives mission assignments from the Federal Emergency Management Agency (FEMA) for national disasters and also undertakes regional or localized projects in partnership with state and local governments or community organizations.

Disaster response constituted 24 percent of NCCC service in FY 2014, 32 percent in FY 2013 and 29 percent in FY 2012. During this period, the largest number of members deployed for disaster response at a single time was 137—less than 16 percent of the enrolled members—in response to Hurricane Sandy. This was the second largest disaster response deployment in NCCC history; only the Hurricane Katrina response was larger.<sup>4</sup> On August 29, 2016, CNCS

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<sup>3</sup> For FY2016, CNCS requested \$ 30.5 million for NCCC.

<sup>4</sup> NCCC could not provide evaluators with the maximum number of NCCC members deployed at a single time as part of the Katrina response.

reported that, of the 800 national service members deployed in response to catastrophic flooding in Louisiana, 40 were NCCC members.<sup>5</sup>

Other CNCS programs also make substantial contributions to disaster response and recovery, coordinated by the Corporation’s Disaster Services Unit, the central hub for all CNCS disaster-response activities. Following the Tuscaloosa, AL tornado, 150 members of Senior Corps’ RSVP program served 5,000 hours and coordinated the work of 8,500 community volunteers. Immediately following the plant explosion in West, TX in 2013, Senior Corps RSVP members evacuated nursing homes, staffed a call center, and assisted with food distribution. More than 3,600 AmeriCorps members from across the country responded to Hurricane Sandy, removing debris and gutting 3,700 destroyed houses, supporting operation of 45 Red Cross shelters and coordinating 30,000 volunteers. Eighteen AmeriCorps State and National (ASN) grantees from seven states joined NCCC members in responding to the May 2011 tornado in Joplin, MO, where they coordinated volunteers, served meals, performed home damage assessments and mucked or gutted damaged homes.

CNCS advertises to the public that ASN, Senior Corps and NCCC have comparable disaster response and recovery capabilities<sup>6</sup>:

	<b>AmeriCorps State &amp; National</b>	<b>AmeriCorps NCCC</b>	<b>Senior Corps</b>
<b>Disaster Response Activities</b>			
Volunteer Coordination/ operations support	✓	✓	✓
Operate base camps	✓	✓	✓
Mass care: shelter and feeding operations	✓	✓	✓
Community and public information outreach	✓	✓	✓
Warehouse and donations support	✓	✓	✓
Call center operations	✓	✓	✓
Direct debris removal mucking/gutting; blue roof tarping	✓	✓	✓
<b>Disaster Recovery Capabilities</b>			
Home construction/ Repair	✓	✓	✓
Public Facilities Renovation	✓	✓	✓
Needs Assessment	✓	✓	✓
Case Management	✓	✓	✓
Disaster Recovery Center Support	✓	✓	✓
Long-Term Recovery Committees	✓	✓	✓
Volunteer Reception Center Support	✓	✓	✓

<sup>5</sup> By contrast, 230 of the 800 national service members deployed by CNCS came from ASN grantees that specialize in disaster response and recovery, known as AmeriCorps Disaster Response Teams (A-DRTs), described hereafter. FEMA Corps and Senior Corps RSVP provided the balance of CNCS’s responders.

<sup>6</sup> See At a Glance—National Service Assets in Times of Disaster, July 2014, available at <http://www.nationalservice.gov/documents/main-menu/2014/national-service-assets-times-disaster>.

While many CNCS grantees respond to requests for disaster assistance, 15 ASN grantees, known as AmeriCorps Disaster Response Teams (A-DRTs), make disaster response part of their core mission and have agreed to serve on disaster response teams similar to those fielded by NCCC. These A-DRTs include a grantee affiliated with an Indian Tribe (the Hoopa Tribal Civilian Community Corps, Hoopa, CA) and several that receive funds through State Commissions. Like NCCC members, A-DRT members receive specialized training in Incident Command; CPR/First Aid; Volunteer and Donations Management; Mass Care/Family Services; Shelter Operations; OSHA-Certified Chainsaw Use; HAZMAT Certification. The A-DRTs enrolled more than 2,000 members in FY 2014, nearly double NCCC's enrollment. Nine of these A-DRTs deployed for disasters in 2014, and seven of them deployed during FY 2012 and FY 2013. According to CNCS, A-DRTs and NCCC "are capable of the same basic direct services in disaster response."<sup>7</sup>

A-DRTs differ from NCCC in a few ways. They typically deploy in teams of 6-8 members, but can adjust team sizes; NCCC deploys in fixed teams of 8-12. A-DRTs can provide their own housing, including staying in tents, whereas housing for NCCC teams must be arranged in advance, sometimes in hotels or similar facilities. A-DRTs charge a fee for their services, to meet their requirement under ASN to match a portion of their Federal funds; NCCC is fully federally funded. A professional staff member leads A-DRTs when they deploy for disaster response; NCCC disaster response teams are led by NCCC members, which, according to some community leaders, makes them less effective and demands more supervisory resources from local authorities. When not called upon by CNCS, the A-DRTs conduct local disaster response, environmental stewardship and conservation activities, similar to the non-disaster activities of NCCC.

## **B. Other Service Activities**

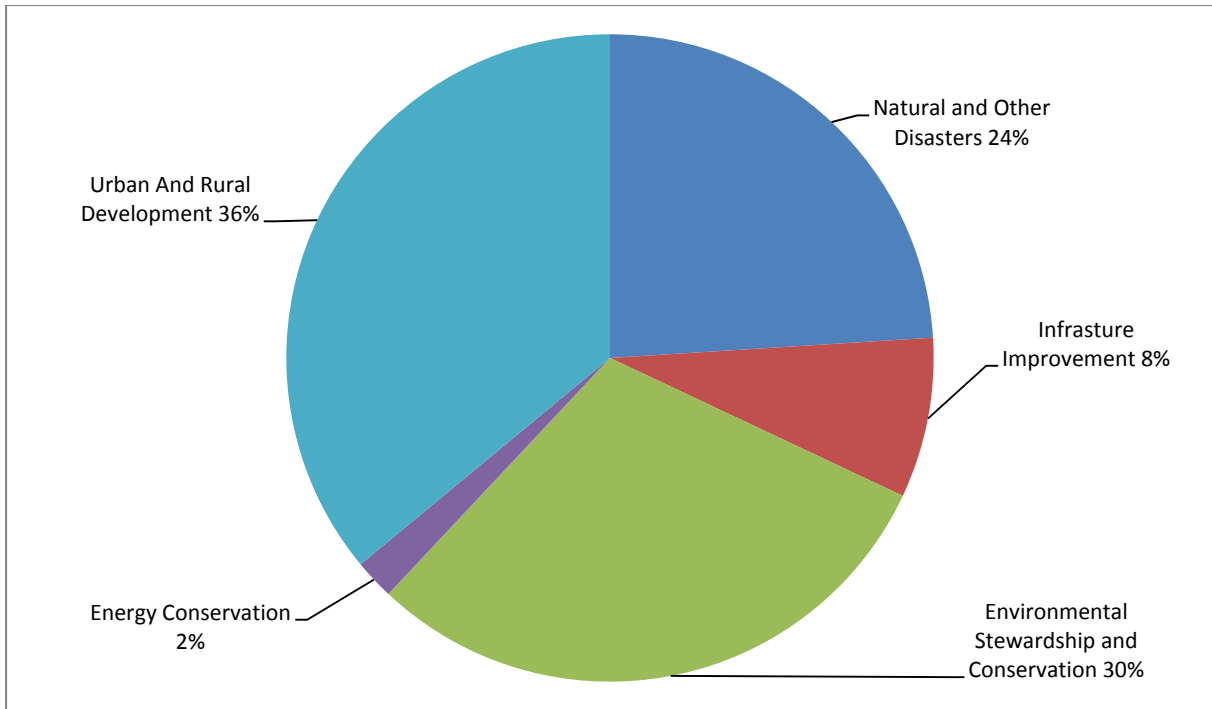
When not engaged in disaster services, NCCC teams undertake projects in partnership with state, local and community entities within their regions, referred to as "sponsors." The sponsors provide local supervision of the projects but are not required to pay a fee or defray any of NCCC's costs.

NCCC service activities are divided into five basic categories. The allocation varies slightly from year to year, depending on the projects selected by each campus. For FY 2014, the allocation was as follows:

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<sup>7</sup> *Id.* While this report is being written, one of the A-DRTs, the Washington Conservation Corps, has 60 members and staff fighting wild fires and supporting related logistics in Washington State. The Corporation's Congressional Budget Justification (CBJ) for FY 2016 showcases the activities of A-DRTs in response to two recent disasters. CBJ at p. 23.





Appendix B contains similar information for FYs 2012 and 2013.

Two categories have accounted for approximately two-thirds of NCCC’s service activities in FYs 2012-2014: (1) urban and rural development; and (2) environmental stewardship and conservation. The first of these is essentially a catch-all for activities that do not fit neatly into NCCC’s other categories. Urban and rural development includes a host of activities to improve quality of life and strengthen a community, such as mentoring and tutoring at-risk schoolchildren; assisting low-income individuals with their tax returns; constructing and improving summer camp facilities for disadvantaged youth; and assisting homeless persons, at-risk youth and veterans. As of this writing, NCCC members were tutoring and mentoring at-risk youth in summer educational programs; serving as counselors in summer camp for disabled youth; inventorying items donated to a community organization for senior citizens; providing meals to impoverished students during the summer; and renovating housing in disadvantaged areas. According to the FY 2016 Congressional Budget Justification, specific activities in this category that will continue to be priorities for NCCC include: assistance to at-risk youth (mentoring and tutoring), providing food, clothing and shelter to homeless persons, including veterans, and assisting low-income people with income tax preparation.

“Environmental stewardship and conservation” activities include: teaching environmental classes/workshops; clearing and maintaining trails for recreational use on public lands; protecting ecologically special species; improving drainage and water quality; and planting trees.

Through grants, ASN funds these same service activities. Education (including mentoring and other interventions for at-risk youth) is the single largest focus of ASN grantees, accounting for

approximately 50 percent of the grant funds expended each year. These activities include School Turnaround AmeriCorps (interventions in high-risk schools); promoting Science, Technology, Engineering and Mathematics (STEM) education; summer reading programs to maintain and improve skill levels; mentoring at-risk students for behavior and attendance; and a variety of interventions to improve college access and academic success for low-income and first-generation-American students.

Major grantees, such as YouthBuild, Habitat for Humanity and Rebuilding Together, also construct, renovate, weatherize and improve the energy efficiency of housing for elderly people and low-income communities. Others focus on job-skills development and employment readiness or improve food security and educate communities about healthy nutrition. Several states sponsor “conservation corps,” which improve trails and other facilities on Federal, state and tribal lands, protect habitats from invasive species, and remove dead undergrowth to prevent wildfires. CNCS also supports numerous organizations<sup>8</sup> that serve veterans and military families, with respect to issues such as medical and behavioral health care, homelessness and housing, job skills and employment and the like. Finally, both ASN and Senior Corps support grantees that provide tax preparation assistance, a priority shared by NCCC.

## **II. FINDINGS**

During our evaluation of NCCC, we found:

- NCCC’s current size and structure do not provide the most cost-effective way to deliver service to communities in need. While NCCC and ASN provide comparable services, NCCC costs four to eight times more per member than AmeriCorps and four to five times more per member than the A-DRTs. Alumni of NCCC and ASN achieve comparable outcomes despite their disparity in cost.
- An increase in member attrition and a decline in enrollment contributed to a significant shortfall in NCCC services provided to US communities and increased the cost per member. NCCC’s member attrition rate increased to 27 percent in FY 2013 and remained high at 24 percent in FY 2014; enrollment declined more than sixteen percent between FY 2012 and FY 2014.<sup>9</sup> NCCC does not have an effective strategy for fulfilling its statutory responsibility to recruit and retain members from disadvantaged circumstances.
- NCCC does not have adequate management controls to enable it to track and manage the full operating cost of each campus or establish adequate performance measures to assess the cost efficiency of each campus.

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<sup>8</sup> In FY 2012, veterans and military families received support from more than 100 AmeriCorps State and National project sites, more than 130 AmeriCorps VISTA projects, and more than 680 Senior Corps.

<sup>9</sup> While enrollment improved in FY 2015, attrition remained high, at 22 percent.

- NCCC does not promptly obtain objective feedback from the community organizations for which NCCC teams provide services, nor does it use the information that it does obtain to evaluate the performance of individual campuses. Without such feedback, NCCC leadership cannot identify weak-performing campuses and direct assistance to improve their performance. Similarly, NCCC does not track expenses by campus and does not treat cost-efficiency as a performance criterion. In making disaster deployments, NCCC disregarded the team's proximity to the disaster and the availability of other, closer teams.
  - NCCC can do more to leverage the substantial public investment in member training by creating pathways to employment and continued volunteering for program alumni.
1. **Services Performed by NCCC Cost Significantly More than Comparable Services by Other AmeriCorps Programs, but the Impacts on Members Are Comparable.**

CNCS has often advocated national service as a cost-effective solution to national problems and reaffirmed its commitment to operate its national service programs in a cost-effective manner. Nevertheless, services performed by NCCC cost Federal taxpayers four to eight times as much as similar service activities by members of ASN. According to CNCS's reports, the public paid \$29,674 to support a single NCCC member in FY 2014, more than the cost of one year's tuition, room and board at a public university.<sup>10</sup> For the same amount, four individuals could obtain two-year degrees from a community college, with funds left over.<sup>11</sup> By contrast, the reported cost per ASN member in FY 2014 was \$7,668, about one-quarter of NCCC's cost.<sup>12</sup>

A. *NCCC services cost four to eight times more than comparable services provided by AmeriCorps State and National.*

We compared the cost per member at NCCC; at the A-DRTs that deployed at the request of the Federal Emergency Management Administration (FEMA) in FYs 2012, 2013, and 2014; and under AmeriCorps State and National (ASN) grants as a group. For comparability, we used member service years (MSY) because that reflects one year of full-time service (1,700 hours) obtained by affected communities. For NCCC, we determined that cost by dividing the

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<sup>10</sup> See, e.g., [http://www.collegedata.com/cs/content/content\\_payarticle\\_tmpl.jhtml?articleId=10064](http://www.collegedata.com/cs/content/content_payarticle_tmpl.jhtml?articleId=10064) (average cost of public university is \$23,000 per year for tuition and expenses, averaging in-state and out-of-state tuition); <http://www.statisticbrain.com/average-cost-of-college-tuition/> (tuition, room and board at public university averages \$ 16,482); <http://college.usatoday.com/2014/11/13/stock-up-on-ramen-average-cost-of-college-rises-again/> (\$18,943 for in-state tuition, room and board at public university, relying on data from The College Board).

<sup>11</sup> See, e.g., <https://bigfuture.collegeboard.org/pay-for-college/college-costs/college-costs-faqs> (tuition and fees at two-year community college average \$3,347 per year).

<sup>12</sup> These figures do not include the education award earned by a member who completes a term of service.

appropriated amount of the NCCC program by the total number of member service years reported by CNCS in its annual Congressional Budget Justification. For the A-DRTs, we used information for those that deployed at FEMA's request during FYs 2012 to 2014.<sup>13</sup> For ASN, we used the cost per MSY reported in the Congressional Budget Justification.

The service provided by an NCCC member cost the taxpayers four times more than service from an A-DRT member in FY 2012, 4.7 times more than that of A-DRT member in FY 2013 and 4.1 times more in FY 2014. An NCCC service year also cost the taxpayers between 3.5 and 3.9 times the cost of the comparable services provided by ASN.

<b>Average Program Cost Per Member Service Year</b>			
	<b>FY 2012</b>	<b>FY 2013</b>	<b>FY 2014</b>
<b>NCCC</b>	\$27,909	\$29,885	\$29,674
<b>ASN</b>	\$8,023	\$7,706	\$7,668
<b>A-DRTs</b>	\$7,000	\$6,388	\$7,159

During the course of our audit, ASN also provided information on the cost per member service hour for the A-DRTs that deployed at FEMA's request. We used information for the Program Years that correspond most closely to NCCC's fiscal year. For ASN, we based the cost per member service hour on the annual figures reported in the CBJ. For NCCC, we determined that cost by dividing the cost of the NCCC program by the total number of service hours, as provided by CNCS.

An hour of service by NCCC cost between 6.8 and 8.6 times the cost of comparable services by an A-DRT and 6 and 7.4 times the cost of comparable services rendered by an ASN grantee:

<b>Average Program Cost Per Member Service Hour</b>			
	<b>FY 2012</b>	<b>FY 2013</b>	<b>FY 2014</b>
<b>NCCC</b>	\$28.20	\$32.33	\$ 33.29
<b>ASN</b>	\$4.72	\$4.53	\$4.51
<b>A-DRTs</b>	\$4.12	\$3.76	\$4.21

Two related factors account for much of the cost differential. First, NCCC is a residential program, burdening it with the costs of developing, maintaining and staffing five large campuses. The program also provides clothing, transportation to and from the campus and a food allowance for the members. ASN grantees, including the majority of the A-DRTs, by contrast, are not residential. Second, like other ASN grantees, the A-DRTs are required to

<sup>13</sup> As a Federal program, NCCC reports its costs and statistics according to the Federal fiscal year, which begins on October 1. A-DRTs, which are Corporation grantees, have various program starting dates throughout the fiscal years. Program Year (PY) 2011 for A-DRTs corresponds generally to Federal fiscal year 2012.

match a portion of the Federal funds that they receive from CNCS. They do this, for the most part, by requiring a community that benefits from their services to pay a fee or otherwise contribute toward their costs. For example, Hoopa Valley Tribe (an A-DRT that is residential) funded 33 percent of its FY 2014 expenses from match contributions.<sup>14</sup>

FEMA reimburses a portion of the operating costs for grantees that provide requested disaster-response assistance. For those assignments, the differences in cost per service hour were smaller, but still significant. Thus, an hour of FEMA-assigned disaster response services from NCCC costs 2.1 times more than an hour of A-DRT response services in FY 2012 and 1.9 times more in FY 2013.<sup>15</sup>

<b>Average FEMA Mission Assignment Cost Per Member Service Hour</b>		
	<b>FY 2012</b>	<b>FY 2013</b>
<b>NCCC</b>	\$30.18	\$35.47
	<b>PY 2011</b>	<b>PY 2012</b>
<b>A-DRTs</b>	\$14.56	\$18.85

In terms of quality, FEMA officials familiar with both the A-DRTs and NCCC confirmed that both perform well but offer different advantages. In their experience, NCCC has a greater capacity to deploy a large number of people quickly, which can be critical to disaster response.<sup>16</sup> However, those officials also observed that the A-DRT teams tend to be more experienced, better trained and exhibit a higher level of professional maturity; while NCCC teams are led by re-enrolled NCCC members, the A-DRT teams are ordinarily supervised by a professional staff person with considerable work experience in conducting such deployments.

<sup>14</sup> The Hoopa Valley Tribe's Federal Financial Report for the period ended September 20, 2014 reported expenditures of \$427,414 in match funds vs. \$566,585 in Federal funds.

<sup>15</sup> For missions assigned by FEMA, the cost differential was lower because: (a) FEMA reimbursed the match costs forgone by the A-DRTs that recalled members from existing projects to undertake disaster projects; (b) A-DRTs may incur additional travel and lodging expenses on FEMA missions that they do not incur during their regular AmeriCorps service; and (c) FEMA did not reimburse certain NCCC costs on particular FEMA mission assignments.

<sup>16</sup> *But see* note 5 and accompanying text (of 800 national service members deployed for response to the Louisiana floods as of August 29, 2016, 40 came from NCCC and 230 came from A-DRTs). We note also that, unlike NCCC, A-DRTs do not necessarily require housing arrangements in place before they deploy. A-DRT teams generally camp out when on a mission, whereas NCCC crews must arrange housing, often in motels, before undertaking a deployment. Also, A-DRTs may deploy within their own state without a formal mission assignment under some circumstances.

B. Alumni of less expensive programs have the same positive outcomes as NCCC alumni.

NCCC's high per-member spending does not translate into correspondingly better outcomes for its alumni. Two recent studies commissioned by CNCS found that alumni of NCCC and ASN achieved comparable outcomes across a variety of measures.

A recent study of 1,468 alumni of NCCC, ASN and VISTA conducted by JBS International, Inc. (JBS) and published in October 2015 found "no strong patterns between outcomes and service area focus or service program."<sup>17</sup> Overall, alumni of the three programs performed similarly in the areas of:

- Post-service career-oriented soft skills, including cultural competency, self-efficacy, self-management and interacting with others;
- Career pathways, *i.e.*, whether alumni maintain a service orientation in their choice of careers;
- Sense of community, *i.e.*, stake in their communities' welfare and willingness to help others; and
- Civic engagement, including various attitudes, beliefs, and behaviors consistent with active involvement in civic and community life.

The study found that NCCC alumni did not outperform ASN alumni, either in multiple areas or in all of the components of a single area. By contrast, alumni who reported having a positive service experience—in any of the three programs—had better outcomes across the board.

CNCS has since undertaken a second study of the same issues, asking many of the same questions, and has shared its draft report with CNCS-OIG. This study, conducted by Abt Associates, Inc. (Abt), largely confirms that alumni of the three programs performed similarly with respect to: (1) sense of community; (2) cultural competency; (3) self-efficacy; and (4) interpersonal skills. NCCC alumni, who had lower scores in these areas and less education at the beginning of their service than enrollees in ASN and VISTA, reported slightly greater improvement (averaging 6.3 points out of a possible 100) than their peers in ASN and VISTA,<sup>18</sup> and more of them reported experiencing personal growth (23 percent NCCC vs. 12 percent ASN). NCCC and ASN alumni reported that their service experience had similar influence on their workplace skills.<sup>19</sup> Overall, the study concluded that all three AmeriCorps programs had

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<sup>17</sup> *AmeriCorps Alumni Outcomes: Summary Report*, October 2015, prepared by JBS International, Inc., at p. 59. The study looked at alumni of VISTA, ASN and NCCC who were two years post-service, five years post-service and ten years post service. Among the research questions to be answered was whether and to what degree the program in which an individual served influenced that individual's outcomes in the four areas listed above.

<sup>18</sup> NCCC has a program-wide focus on member development, including life skills, cultural competency, teamwork and soft career skills. Some, but not all, ASN grantees make member development an important element of their programs. CNCS could encourage or require other ASN grantees to do so.

<sup>19</sup> With respect to career pathways, 15 percent of NCCC members found employment through a connection made during their service, vs. 42 percent of ASN alumni and 46 percent of VISTA alumni. NCCC alumni are least likely to be working in the nonprofit sector and most likely to be working in the private sector.

a strong positive impact on civic engagement, sense of community, cultural competency and self-efficacy, and that the alumni of all three AmeriCorps programs achieved the same or comparable outcomes. Like JBS, Abt found a strong relationship between having a positive service experience and better alumni outcomes.

Neither NCCC nor CNCS has produced evidence that NCCC’s higher per-member investment leads to proportionally better outcomes than other, less expensive programs, either for members or for the communities they serve. We found no basis to conclude that investing \$ 29,674 annually per NCCC member produces vastly superior member development.

*C. By redirecting resources, CNCS can increase its service to communities and enable more members to participate and reap the benefits of national service.*

When programs with comparable community services and member outcomes have vastly different costs, policy makers should question whether the more expensive program represents the best use of public resources. Here, the large cost disparity, especially for the non-disaster work that forms the bulk of NCCC’s activities, suggests that Congress could multiply the impact of the taxpayers’ investment in national service by redirecting a significant portion of NCCC’s funding to ASN.<sup>20</sup> Particularly in a constrained fiscal environment, Corporation leaders should be actively seeking opportunities to maximize the impact and outcome of agency efforts, with existing resources. With comparable activities and member impacts, ASN provides a significantly better return on taxpayer investment than does NCCC. For every slot eliminated at NCCC, ASN could enroll up to four AmeriCorps members, quadrupling the positive impact of participating in national service and the amount of service to communities in need. Even in disaster response, CNCS can have a greater impact by increasing its support of A-DRTs—including encouraging the creation of new A-DRTs in underserved areas—than by maintaining or increasing the current enrollment of NCCC.

With redirected funding from NCCC, ASN could make progress towards the expansion contemplated by the Kennedy Serve America Act; at present, budget constraints require ASN to reject meritorious grant applications and individuals eager to serve. Shifting a portion of NCCC’s funding to ASN would enable CNCS to expand ASN and increase the total services to the public, without a corresponding increase in costs. Because the programs are funded on separate lines of the CNCS appropriation, Congressional action is needed to redirect funds.

This analysis exemplifies the need for CNCS leaders to strategize and plan across program lines to develop the most cost-effective way to meet community needs and improve the lives of

Program	Nonprofit Sector	Private Sector
NCCC	25 %	45 %
ASN	37 %	27 %
VISTA	50 %	24 %

<sup>20</sup> This is consistent with the Corporation’s first strategic goal: “increasing the impact of national service on community needs.”

members, taking into consideration the relative strengths, capabilities and cost of NCCC and other programs. The Corporation should determine which, if any, of NCCC's activities require the expensive, intensive, residential model that is NCCC's hallmark, and which could be performed by new or existing ASN grantees (including A-DRTs). It makes no sense, for example, to train, house and transport NCCC members to provide tutoring and income tax assistance, services that could be provided locally through ASN or Senior Corps grantees at far lower cost. Another consideration is that only a fraction of NCCC's enrollment is needed at any one time for disaster response; the largest deployment of NCCC members at any one time in the last five years was in response to Hurricane Sandy, when NCCC deployed 137 members, 16 percent of its enrollment. (With the cultivation of new A-DRTs, there will be even less need to maintain a sizeable NCCC.) Finally, CNCS must also consider NCCC's remaining commitment to provide support for FEMA Corps, and any renewal of that relationship.

The time is ripe for a reconsideration of the NCCC model and its place in the menu of national service programs. To the maximum extent possible, ASN, VISTA and/or Senior Corps should be called upon to provide the services that those programs can perform effectively, with NCCC reserved for those projects that demand its more expensive training and approach.<sup>21</sup> Taking into consideration the foregoing factors, plus NCCC's underenrollment and high attrition rates (see Finding 2), the Corporation should determine the optimal size of NCCC and how many campuses should remain in service in order to house and train a right-sized NCCC. CNCS should share that information with the appropriate authorizing and appropriations House and Senate subcommittees, together with a proposal that the savings be transferred to ASN for new grants to replace the more expensive NCCC services. A multi-year phased approach may be needed. CNCS should offer a particularly compelling justification for any program that invests nearly \$30,000 taxpayer dollars in a single individual, when the public can obtain comparable results by investing one-quarter of that amount.

### **Recommendations**

CNCS should:

1(a). Increase the impact of national service on communities and participants, by targeting Corporation resources in a manner that maximizes the cost-effectiveness of CNCS programs and activities. NCCC should be scaled back, in favor of scaling up other, less expensive CNCS programs that perform many of the same activities.

1(b). Determine the optimal size of NCCC based on the factors stated in this report, eliminating to the maximum extent practicable projects of the kind performed by ASN, VISTA and Senior Corps, and right-size NCCC accordingly, thereby reducing the excess overhead and per-member costs associated with those projects.

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<sup>21</sup> NCCC should undertake garden-variety service projects only where necessary to maintain full utilization.



1(c). Work with Congress to reprogram the funds and responsibilities to expand ASN, VISTA and Senior Corps, thereby multiplying four to eight times the services provided to communities and the number of individuals who can participate in national and community service.

1(d). Enhance the capabilities of A-DRTs to deploy rapidly for disaster response, in advance of FEMA mission assignments.

1(e). Limit the types of projects that NCCC campuses can undertake to minimize use of NCCC members for activities that can be undertaken by other CNCS programs. Track the time devoted by each campus to such activities.

1(f). Cultivate the expansion of and creation of A-DRTs, to increase disaster response and recovery capabilities throughout the United States and to expand opportunities for rigorous team-based training and service, without the costs of the full-time residential model now used by NCCC.

1(g). Create peer-to-peer education and mentoring for new A-DRTs to help them scale up quickly.

**2. NCCC Suffers from Underenrollment and High Attrition, Increasing Its Cost Per Member.**

Although NCCC considers full enrollment “critical” to achieve maximum efficiency and impact, the program failed to meet its goal of enrolling 1,200 members for FYs 2013 and 2014. The FY 2013 shortfall was a modest two percent, but the shortfall for FY 2014 was ten percent, representing a loss of 212,500 service hours<sup>22</sup>, while the program’s budget remained \$30 million. According to the NCCC Deputy Director, demand for NCCC membership tends to decline as the economy improves. This suggests that, as long as unemployment remains low, NCCC can expect continued difficulty meeting its enrollment and service goals, absent substantial changes in its recruiting.

At the same time, a large percentage of NCCC members fail to fulfill their ten-month commitments. NCCC’s attrition increased from 17 percent in FY 2012 to 27 percent in FY 2013, and remained high at 24 percent in FY 2014.

Regional Campus	Class No. 18 <sup>23</sup> Attrition Rate	Class No. 19 Attrition Rate	Class No. 20 Attrition Rate
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<sup>22</sup> NCCC fell 125 members short of its enrollment goal of 1,200 members in FY 2014.

<sup>23</sup> Class Numbers represent the starting dates for all classes within a given fiscal year. The beginning dates are staggered across campuses and they often extend into the following fiscal year. Class No. 18 began in Fiscal Year 2011.

Baltimore (Atlantic)	15%	30%	24%
Vinton (North Central)	21%	26%	27%
Sacramento (Pacific)	20%	26%	23%
Vicksburg (Southern)	14%	24%	26%
Denver (Southwest)	15%	26%	21%
<b>Overall</b>	<b>17 %</b>	<b>27%</b>	<b>24%</b>

Taken together, underenrollment and high attrition represent a significant shortfall in the service that NCCC can provide. With 1,200 slots available and 1,075 traditional NCCC members enrolled in FY 2014, only 821 individuals (76 percent) completed their ten months of service. In FY 2014, approximately one-third of the slots were never filled or were vacant before the end of the service term. Most of the attrition occurred during the first half of the service term. In FY 2015, the program enrolled 1,133 members, 252 of whom left without completing their service, 22 percent attrition. Not only does this result in fewer service hours, it also drives up the cost per member, because the program’s largest fixed costs—maintaining five large residential campuses—remain unchanged, even if those campuses are underutilized.<sup>24</sup>

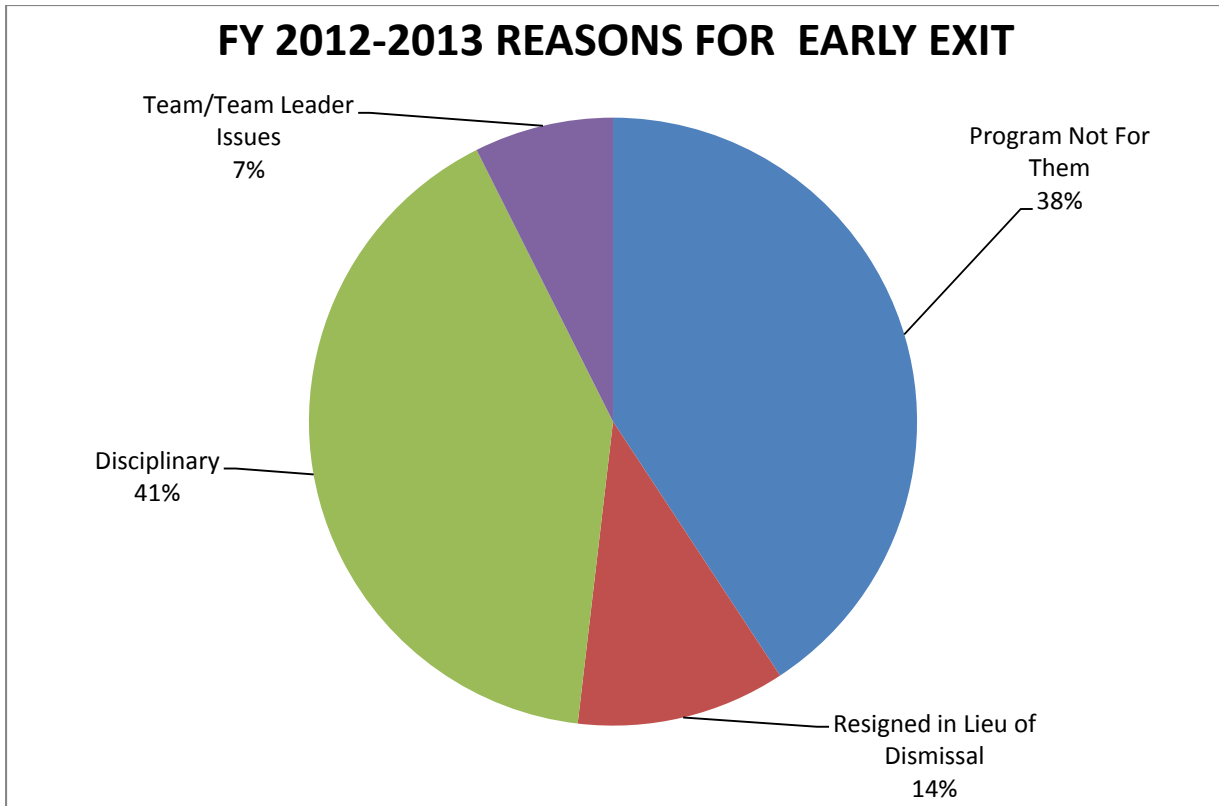
During the comparable period, attrition at AmeriCorps National and AmeriCorps State either remained stable or declined:

Calendar Year*	National	State	NCCC
2011	21%	19%	15%
2012	23%	17%	19%
2013	18%	17%	25%
2014	19%	17%	26%

\*Because the figures in this table are presented on a calendar year basis, they differ slightly from the corresponding figures in the prior table, which were compiled on a fiscal year basis.

NCCC has historically compiled limited information concerning the reasons for members’ early exits, breaking down into four categories: (1) program is not for them, (2) resigned in lieu of dismissal, (3) disciplinary and (4) team and personal issues. The first three categories represent NCCC’s greatest opportunity to reduce the attrition rate. The attrition associated with each of these reasons is shown below:

<sup>24</sup> Appendix C illustrates the underutilization of NCCC’s campus facilities.



A detailed summary of the reasons for attrition by year and at each NCCC campus appears in Appendix A.

As the chart illustrates, more than half of NCCC’s high attrition is discipline-related: resignation in lieu of dismissal or dismissal for disciplinary reasons. These members were unwilling or unable to conform their behavior to accepted norms in significant ways. This in turn suggests that NCCC is not selecting the right applicants and/or not managing their behavior effectively. The number who leave because the program is not for them likewise suggests that those members did not have realistic expectations when they enrolled in the program.

The current Acting Director of NCCC insists that members who quit or are removed from NCCC nevertheless benefit from the training that they received. However deeply held, this belief is not supported by data. To the contrary, CNCS’s recent studies showed that members benefited from the program *if they had positive service experiences*. A member who quits out of dissatisfaction with NCCC or because of an inability to get along with team members can hardly be said to have had a positive service experience. The same is true for members who are dismissed as discipline for misconduct or who resign in lieu of discipline. The Acting Director stated that she was not familiar with the study.

During this evaluation, NCCC leaders attributed much of the increase in attrition to a requirement imposed by the Kennedy Serve America Act that 50 percent of NCCC members come from disadvantaged circumstances. Prior to this requirement, they report, attrition

hovered around 12 percent. As enrollment of disadvantaged youth reached 30 percent—it climbed to 40 percent in of FY 2014—attrition rates more than doubled. Officials at the North Central and Southern campuses shared with evaluators their view that enrollees from disadvantaged backgrounds have greater difficulty adapting to the environment. If program officials are correct about the cause of rising attrition, then in the seven years since the statute was passed, NCCC has not adequately addressed the needs of members who come to the program from disadvantaged circumstances.<sup>25</sup>

The increasing enrollment of members from disadvantaged circumstances has proven challenging to NCCC in a number of respects. First, for purposes of measuring enrollment of disadvantaged individuals, CNCS treats FEMA Corps and traditional NCCC as a single unit. FEMA Corps, however, has rigid and rigorous eligibility requirements that effectively preclude enrollment of significant numbers of disadvantaged members. NCCC therefore enrolls correspondingly more individuals from disadvantaged circumstances in order to approach the overall 50 percent goal; if FEMA Corps were to enroll at full capacity, nearly all of NCCC's enrollment would have to be disadvantaged.<sup>26</sup> CNCS-OIG believes that the unique eligibility requirements of FEMA Corps, which are beyond NCCC's control, should not be allowed to impinge on the operations of the traditional NCCC. The two programs should be treated separately, and whether FEMA Corps meets the 50 percent enrollment requirement should not drive NCCC's recruitment and enrollment decisions. CNCS-OIG questions whether the Kennedy Serve America Act compels CNCS to treat these programs in the aggregate for purposes of measuring whether they have met the 50 percent enrollment goal. But if CNCS thinks otherwise, then it should explore a legislative solution.

Second, statutorily required to undertake outreach and recruitment to increase participation by disadvantaged youth, NCCC relies heavily on three “recruitment partners”—YouthBuild, the Labor Department's Job Corps program and the National Guard Youth Challenge Academies—programs open only to disadvantaged youth—to refer their alumni to NCCC. A study conducted by NCCC in 2014-2015 concluded that individuals referred by these recruitment partners were four times more likely to exit early. The study, however, does not specify the root cause of that attrition, *e.g.*, whether it arises from the social and economic circumstances of the referred members, whether the recruitment partners do not accurately communicate the demands of NCCC service, or whether they are not sufficiently selective in their referrals or NCCC in its selection. Moreover, the study does not compare the retention of members referred by

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<sup>25</sup> Program officials also opined that NCCC places greater demands on members than does ASN and should therefore be expected to have higher attrition. Quite apart from NCCC's service activities, the residential nature of the program presents unique challenges. Members may be away from home for the first time and find the communal living arrangements (including lack of privacy in dormitory or barracks-like residences and team responsibility for meal preparation within a limited budget) challenging. Although these factors—the nature of the service, absence from home and communal living—might explain why NCCC would have a higher attrition rate than ASN, they cannot explain the uptick in attrition at NCCC, as those conditions have remained constant.

<sup>26</sup> Before entering into an agreement with FEMA to operate FEMA Corps, NCCC should have considered any impact on traditional NCCC enrollment decisions and made appropriate plans to manage that effect.

recruitment partners to that of disadvantaged members who come to NCCC via another route.<sup>27</sup> The program has not determined what factors distinguish successful disadvantaged members from unsuccessful ones. Equating recruitment-partner referral and economic disadvantage may be under-inclusive and therefore misleading.

Correctly identifying the root cause of the attrition problem is essential to develop an effective retention strategy. If the problem is that recruiting partners are encouraging unrealistic expectations, then providing them with a clear, unvarnished articulation of program conditions and expectations may reduce attrition. This is one option under consideration by NCCC, and NCCC has prepared a revised set of written Core Expectations for Corps Members and Team Leaders to be used at the recruiting and pre-application stage. If, on the other hand, disadvantaged members are significantly more likely to leave the program early for other reasons, a different solution is warranted.

We offer a few additional observations regarding NCCC's relationships with its recruitment partners. First, the fact that successful alumni of these three federally supported programs wash out of NCCC at a high rate raises serious questions about the effectiveness of those programs in equipping disadvantaged youth for employment and civic life. YouthBuild enjoys substantial AmeriCorps funding, and the AmeriCorps program should consider NCCC's experience with YouthBuild alumni in establishing performance goals and weighing the merits of future investments. The Department of Labor and the National Guard should also be made aware of these outcomes, so that they, too, can act on that information.

Second, the practice of enrolling the same individuals in successive Federal programs merits attention. In addition to concerns about fostering a culture of dependency, issues of fairness arise when the same individuals benefit repeatedly from oversubscribed programs, while others are shut out.

Third, NCCC is by no means the only CNCS program that includes a high proportion of members from disadvantaged circumstances. By identifying grantees with similar missions that excel at enrollment and retention, NCCC (as well as certain AmeriCorps grantees) might obtain useful guidance about how to duplicate their success.<sup>28</sup>

NCCC should broaden its recruitment strategy to look beyond the three partners whose referrals have proven less than successful. Outreach to faith-based and immigrant communities in disadvantaged areas might engage individuals more likely to succeed in the

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<sup>27</sup> Program leaders told CNCS-OIG that, apart from individuals referred by a recruitment partner, they cannot reliably identify other members whose circumstances are disadvantaged. Their only other source of information is a member's self-identification in a survey. We suggest that a member's residential zip code or the location of the schools that member attended could provide useful information. Further, the campus directors and team leaders who interact regularly with members and know them personally likely have substantial information about those members' circumstances.

<sup>28</sup> The Corporation's information technology does not support data analytics, which would make it easy to identify the grantees with the best enrollment and retention results. With a need this critical, however, undertaking the laborious task of identifying them manually may be worthwhile.

program. Parochial school systems and urban clergy alliances could be useful points of contact. With NCCC's Atlantic Campus located on urban property owned by the Catholic Archdiocese of Baltimore, the program has a unique opportunity to recruit from its urban parochial schools (which enroll both Catholic and non-Catholic students), churches and other programs that serve target populations. Charter schools may be another good source of students who come from motivated families invested in their success. Program leaders must think creatively about which individuals and organizations in a community are likely to engage motivated young people and/or their parents. Examples include high school athletic coaches, Boys and Girls Clubs, Police Athletic Leagues, community centers with after-school and summer programs, and the like. Outreach to parents, in addition to potential members, may help attract applicants whose families will support and encourage them.

NCCC has established a retention committee to analyze attrition data and make recommendations for improvements. The committee's preliminary findings were provided to us in June 2015. Its draft recommendations include: (1) gathering more detailed data about the reasons for members' early departures; and (2) using a revised set of written Core Expectations for Corps Members and Team Leaders at the recruiting and pre-application stage, for training and for assessment and behavioral performance throughout a member's term of service. As of this writing, NCCC's leadership has not yet approved the report, though it intends to develop a comprehensive plan to improve member retention.

NCCC should develop a comprehensive, risk-based enrollment and retention strategy that:

- Identifies individuals and organizations likely to engage motivated youth from disadvantaged circumstances;
- Targets individuals for recruitment and selects members based on the qualities and characteristics that distinguish successful members;
- Encourages self-selection by potential applicants by clearly communicating the program demands, conditions, expectations and behavioral norms; and
- Elicits as part of the application process sufficient information to select those who are most likely to benefit from the program and to complete their terms of service.

This may include rejecting applicants whose histories reflect repeated conflict with authority, significant and/or repeated disciplinary incidents, an inability to compromise disagreements or insufficient motivation and eagerness for new experiences. Program leaders might wish to consider testing the use of personality inventories or similar attitudinal questionnaires.

Currently, NCCC decides whom to admit based on a written application and recommendations, with limited opportunities for personal contact with applicants. This may make it difficult to probe an applicant's adaptability, amenability to teamwork, ability to resolve disagreements constructively, expectations about the program and other personal traits and skills conducive to success in NCCC. NCCC should pilot structured interviews to identify applicants best suited for NCCC, and determine whether that could improve success rates.

The program must also provide additional support and guidance to assist members in adapting, mediating disagreements and, where necessary, providing individual counseling and behavior management. Pre-orientation for some enrollees might be useful. At some of the campuses, it may be possible to engage local Foster Grandparents or RSVP members as mentors or in another supportive capacity.

The proposed Core Expectations document is a good start, as is the proposal to gather more granular information about attrition. But more must be done to reverse the current trends, which pose a serious challenge to NCCC's effectiveness. The problem is urgent and cannot be put aside pending the collection of more data. Significant interventions must begin immediately.

Further, we believe that this effort should not be limited to NCCC, but should also engage the A-DRTs and other ASN team-based grantees with similar activities. Sharing best practices may improve enrollment and retention across both programs. Doing so may ultimately enable CNCS to match applicants to the program best suited for them, whether that be NCCC or an ASN grantee.

### **Recommendations**

CNCS should:

2(a). Treat NCCC FEMA and traditional NCCC separately for purposes of achieving the goal of 50 percent participation by individuals from disadvantaged circumstances.

2(b). Develop a comprehensive, risk-based enrollment and retention strategy that includes the features outlined in this report. This includes but is not limited to identifying the characteristics of individuals, including those from disadvantaged circumstances, who are most likely to succeed in NCCC and developing interview techniques and application questions to identify applicants likely to complete their service terms successfully.

2(c). Establish enrollment and retention goals each fiscal year.

2(d). Track enrollment and retention data to ensure that goals are met and/or to identify causes for failure to meet goals and implement corrective actions. Identify systemic issues and/or patterns.

2(e). During the recruiting and the application processes, use a clear and consistent statement of behavioral expectations that highlights features of the program that cause individuals not to complete their service terms. Make clear what sorts of individuals will not be happy or successful in NCCC. Use the same behavioral expectations during the program.

2(f). Gather and maintain better data on which NCCC members come from disadvantaged circumstances, for example by looking at the member's zip code of residence, tracking whether

the member or the member's family has received public assistance in the last five years, and any other indicators that NCCC may develop.

2(g). Reduce reliance on existing recruitment partners and develop better screening of their referrals.

2(h). Inform recruiting partners of the attrition rate of their referrals so that they may implement action as they deem appropriate.

2(i). Develop a policy, with criteria, that limits the number of members who are recruited from other Federal programs.

2(j). Identify community organizations and activities likely to engage highly motivated youths and families, including faith-based, immigrant, after-school programs, athletic programs, etc., and recruit from those. Explore a pilot program with the Catholic Archdiocese of Baltimore and/or charter schools that serve target populations.

2(k). Test whether structured interviews to assess specific traits and characteristics would improve selection and retention.

2(l). Determine what kinds of support would increase retention, and provide it, whether it be behavior-management, counseling, mediation, etc. Engage nearby Foster Grandparents and other local community groups to provide support.

2(m). Identify those campuses and staffs with consistently high and low attrition. Share effective strategies.

2(n). Set program-wide and campus-wide performance goals for campus leaders and staff that tie together recruitment and retention.

2(o). Enhance the existing interviews of exiting members and conduct interviews of their peers, sponsors, and campus leaders to determine the root causes of attrition. Develop and maintain more granular information regarding the reasons for attrition. Use the resulting information to inform recruiting, selection and support.

2(p). Once NCCC is right-sized as recommended, defer any increase in the program's size until the program consistently achieves full enrollment and a retention rate above a pre-determined threshold.



### **3. NCCC Should Assess the Programmatic Performance of Each Campus Timely and Objectively and Share the Results with Campus Leaders.**

To maximize NCCC's impact, program leaders need data that measures and tracks the performance of each campus to assess its effectiveness. Without this data, NCCC cannot determine identify opportunities for programmatic improvement.

Compiling timely sponsor feedback is essential to measure performance. NCCC conducts an "In-Progress Review"<sup>29</sup> of each campus, but individual campuses do not formally obtain and track feedback from project sponsors regarding the quality of the members' performance and conduct, any unanticipated problems or challenges, or areas for improvement. And when NCCC leadership solicits feedback from sponsors, the requested information is often non-objective and unverifiable, which limits its usefulness and makes comparisons difficult. The results are reported in the aggregate, potentially masking differences among campuses in the quality of their performance.

While there are many occasions for informal contact with project sponsors during and immediately after completion of a project, none of them requires a formal assessment by the sponsor. During a project, team leaders (*i.e.*, NCCC members) serve as the principal liaisons between the sponsor and NCCC. Sponsors and team leaders meet weekly to discuss progress and any needed adjustments to project plans. At the mid-point and completion of the projects, the NCCC campus's Assistant Program Director (APD) also engages informally with the sponsors regarding project status/result evaluation and feedback on NCCC member performance, but the results are not typically reduced to writing.

Following completion of a project, the team leader prepares a Project Completion Report (PCR), which includes a summary of the project, quantifies and comments on the accomplishments, the benefits of the project to the community, and the benefits of the project to NCCC members, and notes the number of members who participated and the total hours served. These reports are signed by the Campus Director and a representative of the project sponsor. There is no requirement for timely written feedback from the sponsor. While NCCC officials noted that sponsors have the option to insert written comments in the space after their signature lines, none of the sponsors left such feedback on any of the 42 PCRs reviewed for the North Central and Southern campuses during FYs 2012 and 2013.

The only formal feedback that NCCC solicited was an annual survey of a subset of project sponsors conducted by JBS International, Inc., a consulting firm that provides various services, including surveys and program evaluation. The survey results were aggregated and briefed to campus leaders at annual meetings. The briefings did not break out results by campus but merely collected sponsors' responses to general questions. For example, the FY 2012 briefing reported the following results:

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<sup>29</sup> The In-Progress Review considers member outreach; development, and selection; special initiatives; project outreach and implementation; member development; member quality of life; personnel and administrative services; resource management; operations; human capital; and management principles.

- 95 percent of the sponsors enhanced their ability to provide services, including increasing the number of people they could serve and the amount of service they could provide;
- 92 percent of the sponsors were able to meet project objectives quickly; enabling many to move to the next phase of work or complete other projects;
- 87 percent of the sponsors will be able to sustain the project's outcomes;
- 80 percent of the sponsors improved relationships with other organizations or developed new partnerships; and,
- 66 percent of the sponsors enhanced community awareness of their work and mission.

While the results are largely positive, and in many instances strongly so, aggregating them may obscure significant differences in effectiveness among the five campuses. Both NCCC headquarters and campus leaders need feedback that allows them to track programmatic performance by campus, just as we have recommended that they track cost-effectiveness by campus. This would allow program leaders to identify particularly strong performance and develop best practices to improve performance across the program.

Further, JBS's survey methodology is subject to certain inherent limitations. First, the survey sampled only one source, project sponsors, and did not measure outcomes from the perspective of any other community stakeholders. Second, there was no opportunity to ask follow-up or clarifying questions. Third, a number of the questions called upon the project sponsor to *estimate* the project's impact (e.g., percentage increase in the number of people served), without any hard data or verification of accuracy. Finally, because the surveys were conducted well after the projects' completion, the lapse of time may have further impaired the accuracy of the responses.

We also note that many of the survey questions were "soft" and subjective, making comparisons difficult. We believe that NCCC would be well served to develop at least some objective criteria or ratings for use by sponsors, perhaps based on whether the members met specific pre-determined expectations, e.g., the number of houses made energy-efficient. Objective, verifiable metrics may be particularly important to counteract the impetus for sponsors to give positive ratings in order to secure repeat services at no cost by NCCC.

### **Recommendations**

CNCS should:

3(a). Collect timely, objective, substantive feedback from sponsors, measured against objective outcomes, with the results broken out by campus.

3(b). Compare sponsor feedback to the team leaders' assessments of each project.

3(c). Use the results for performance management of campus leaders and peer-to-peer training to leverage the strategies of high-performing campuses, as well as to identify where corrective actions are needed.

#### **4. Disaster Deployments Could Be More Cost-Effective.**

NCCC has limited ability to predict if, when and where a disaster will occur. Quick and effective mobilization is therefore necessary to provide essential services, meet critical needs for food and shelter and begin recovery activities. Members told our evaluators that participation in disaster deployments is one of their most satisfying and meaningful experiences in NCCC.

We learned, however, that NCCC has sometimes transferred a team from a project near one disaster area to respond to another disaster far from that team's location, and then deployed distant teams to respond to the first disaster. For example, although NCCC had a team on location in Detroit for a non-disaster project when the city experienced severe flooding, that team was sent to an unrelated disaster in South Dakota, and NCCC brought teams from as far away as Nebraska to deal with Detroit's floods. Assigning the first team to remain in Detroit and work on flood relief could have saved significant time and deployment costs, and it would likewise have been far more efficient to direct the Nebraska team to South Dakota.

Another constraint in disaster deployments is that certain teams were considered unavailable to deploy because they experienced problems with "team dynamics," that is, an inability to work together, a high incidence of conflict or other problematic behaviors. The unavailability of certain teams can give rise to an imbalance in disaster deployments, impose higher travel costs or leave urgent needs unmet. In FY 2013, for example, the Vinton (North Central Region) campus devoted only 11 percent of its service hours to disaster response, while the other campuses ranged from 24 to 50 percent. Persistent and severe team dynamics problems invite questions about whether applicants were properly screened and why team leaders and campus leaders were unable to resolve these issues.

NCCC does not place enough value on efficiency and cost-effectiveness in making disaster deployment decisions. This increases travel costs and may delay response times in urgent circumstances. Proximity should play a greater role in these deployment decisions. Persistent unreadiness or unavailability due to team dynamics should trigger inquiries and effective interventions by program leaders.

#### **Recommendations**

4(a). NCCC should establish policies and procedures to place greater weight on cost-effectiveness, including proximity and transportation costs, when determining which teams should be deployed for a particular disaster relief project.

4(b). NCCC should operate under a presumption that the nearest teams will respond to a disaster, and that disaster response projects take priority over other assignments, where practicable.

4(c). To provide quality, professional supervision comparable to that of the A-DRTs, an experienced NCCC staff member should be on-site to oversee disaster-related spikes.

**5. *Observation:* Creating Pathways to Public Employment and Volunteering for NCCC Alumni Would Leverage the Investment in Their Training.**

Given the substantial public investment in NCCC training and experience, CNCS should develop ways that NCCC alumni can continue to contribute to their communities. Anecdotal evidence suggests that many alumni would like to use their training and experience, including in careers in service.

The Corporation should explore ways to leverage the strong relationships that it has cultivated with State and municipal governments, to promote employment paths that would retain for the public the benefits of NCCC members' training, discipline and experience. At a minimum, it should work with these entities to encourage hiring of NCCC alumni in capacities to which their skills may be directly relevant, including first responders, such as police, firefighters and emergency medical technicians; conservation and natural resources, such as park and forest rangers; programs to renovate urban housing, and the like. NCCC could explore outreach to National and state associations of Chiefs of Police, Fire Chiefs, State Park Directors, Emergency Medical Services Chiefs and others. This NCCC-focused effort could expand upon the Employers of National Service network for all AmeriCorps alumni created in 2014, in which a few cities already participate. CNCS could ask that State and local entities recognize the NCCC experience favorably in hiring criteria for relevant positions, much as the Federal government did for national service in 2013. According to NCCC leadership, they have established such a relationship with the Bureau of Land Management and also refer members to participants in the Cities of Service initiative. NCCC should provide all alumni with a standard form letter that can be submitted to a potential employer as part of a job application that details the training provided and the experience gained through successful completion of NCCC service.<sup>30</sup>

Apart from public employment, CNCS should actively encourage NCCC alumni to use their skills in a volunteer capacity. For example, CNCS could connect alumni to organizations in their local communities with aligned missions, such as the Red Cross, Habitat for Humanity, or volunteer fire and rescue squads. Perhaps the State Commissions and/or the State Offices could play a role in connecting NCCC alumni to grantees in their own communities.

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<sup>30</sup> ASN should extend a similar effort to the A-DRTs and other grantees with team-based operations.

## **Recommendations**

5(a). Given the substantial investment in training NCCC members, CNCS should leverage its relationships with Federal agencies and state and local governments to promote more pathways to public employment positions for which NCCC members developed skills and familiarity.

5(b). CNCS should leverage its State Offices and State Commissions to connect NCCC alumni with nonprofits in their local communities with missions aligned to their skills, such as the Red Cross, Habitat for Humanity and volunteer fire and rescue squads and other similar organizations.

### **III. ADDITIONAL BACKGROUND**

NCCC's program goals are to strengthen communities and develop leaders through direct, team-based national and community service. In order to achieve these goals service, projects are developed in partnership with sponsors from non-profits—secular and faith based—local municipalities, state governments, Federal government, national and state parks, Indian tribes, and schools. Members are responsible for completing service projects throughout the region in which they are assigned.

Individual applicants that are selected to participate as members in the program are assigned to serve at one of five campuses. NCCC also seeks applicants for team leaders that are experienced supervisors who may have prior service experience in communities, schools, the Peace Corps, AmeriCorps, youth corps programs, or the U.S. military, and have demonstrated leadership experience. The NCCC team leaders are responsible for supervising a diverse group of members to work and grow as a team, manage conflicts, enforce campus policies and regulations, manage the execution of service projects, timekeeping, coordinate project logistics with unit leaders<sup>31</sup> and project sponsors, and prepare budget and project completion reports. Team leaders are required to make a full-time, 11-month commitment and receive a living allowance of \$12,500, room and board, and limited health and child care benefits. Team leaders also receive an education award upon successful completion of the program.

Standard training provided to its members includes information on:

- Serve America Act/Stafford Act,
- campus standards and values,
- service learning,
- independent service projects,
- General Educational Development (GED) assistance program,

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<sup>31</sup> The Unit Leader is the NCCC staff member with first-line supervision over five to seven NCCC teams and their leaders. The Unit Leader plans most of the details of a project and how it is to be accomplished at the individual project sites.

- member benefits,
- housing,
- team building, and
- safety and project management.

In addition, standard skill training is provided in the following areas: tool usage and safety, American Red Cross Certification (first aid, cardiopulmonary resuscitation and automated external defibrillator), and psychological first aid. Fire Fighting Certification training is also available for those members that want to serve in that capacity. NCCC training is largely conducted by staff members with the exception of the American Red Cross and Fire Fighting Certifications, which are provided by contractors and Federal entities (e.g., U. S. Fish and Wildlife Service).

The campus class periods are scheduled to ensure that members are available on a year-round basis. Two periods take place on a fall cycle (Southwestern and Pacific) while the remaining ones occur on a winter cycle (Atlantic, Southern and North Central). Each campus has four service rounds that accounts for a six to eight week period, to be determined by each campus, which will be carried out by that year's member class. Each team will conduct approximately three projects each round for a total of about 12 projects during that service period. This will enable the team to provide services in disaster prevention, preparedness and relief areas, infrastructure improvement, environmental stewardship and conservation, urban and rural development, and energy conservation.

#### **IV. OBJECTIVES AND SCOPE**

Our evaluation covered a three-year period from FYs 2012 to FY 2014, supplemented with more recent data in some instances. Its primary objectives were to:

- Evaluate how efficiently and effectively the Corporation is managing its NCCC program;
- Identify opportunities for cost savings and improvement in the NCCC program.

We conducted this evaluation in accordance with the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE). CliftonLarsonAllen LLP performed fieldwork and assisted in drafting the evaluation report.

## **V. CNCS RESPONSE**

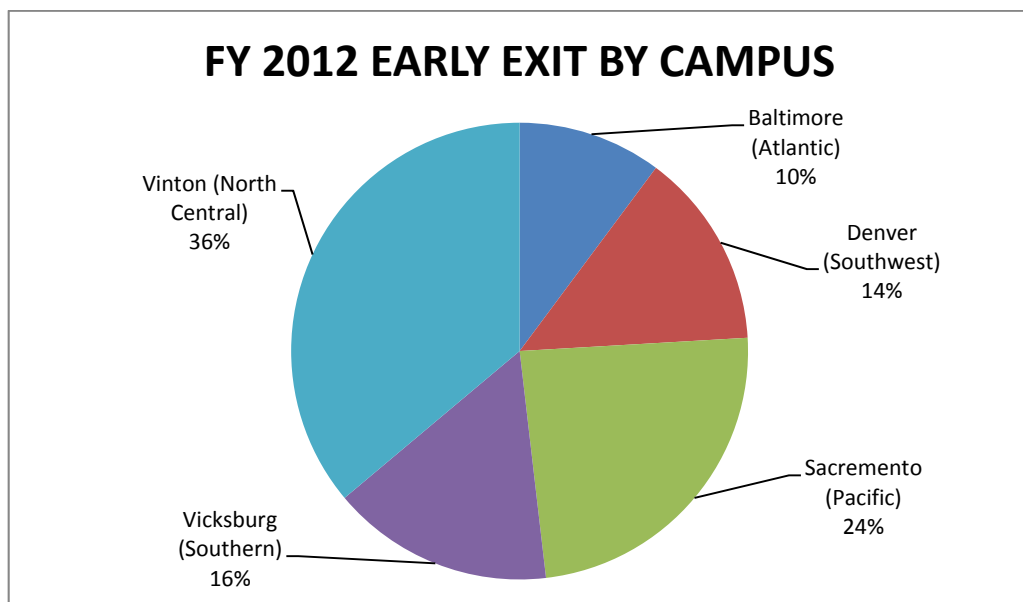
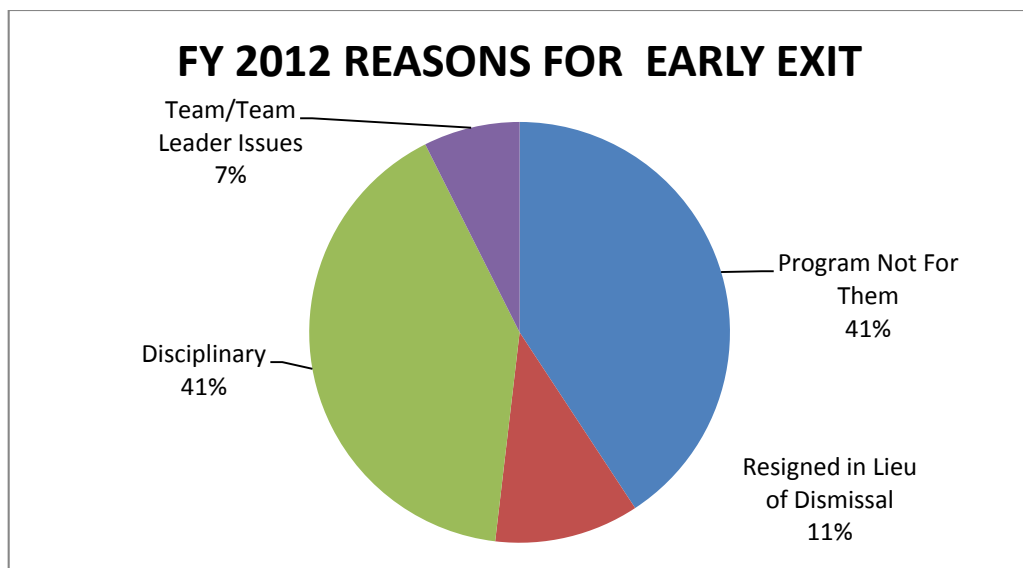
In CNCS's response, it stated that "NCCC represents a unique, immediately deployable national service strike team capable of responding to crises at the direction of CNCS leadership and Administration needs. Unlike any other national service resource, NCCC teams can be on the ground immediately as the need is realized, with the infrastructure and flexibility to remain on the ground to support long-term operations. Direct comparisons to other national service programs are difficult and cannot adequately capture the responsiveness and flexibility unique to the NCCC program. Nonetheless, NCCC has already taken-and will continue to take-proactive steps to improve its operational efficiency and maximize its return on the federal investment. NCCC's operation, staffing, annual appropriation, and structure are a function of existing federal law. CNCS is committed to working with Congress and the Administration to maximize the efficient fielding of this unique and valuable resource."

## **VI. OIG COMMENTS**

CNCS justifies spending nearly \$30,000 per person in NCCC, because of NCCC's ability to deploy rapidly in response to disasters. Only 17 percent of NCCC's time in FY 2016 was devoted to disaster response. See *Agency Financial Report for FY 2016* (AFR), at p. 16. Last year, the taxpayers maintained five campuses and provided room, board and clothing for up to 1,200 individuals who spent 83 percent of their time on non-disaster activities also performed by non-residential CNCS grantees at much lower cost. If CNCS is genuinely committed to maximizing the return on the public's investment in national service, it should explore increasing the rapid deployment capabilities of the A-DRTs, rather than maintain excess capacity at NCCC.

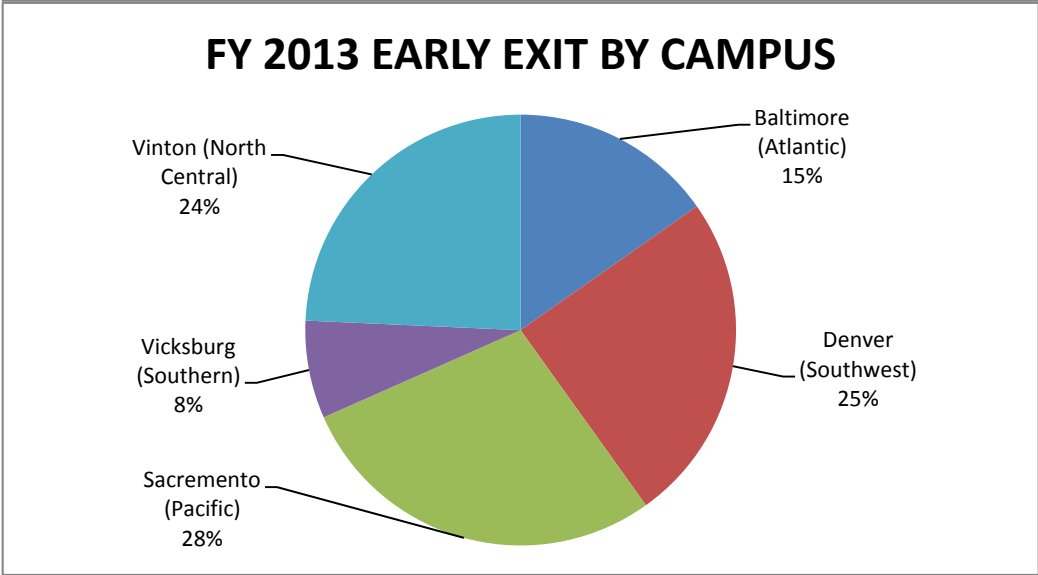
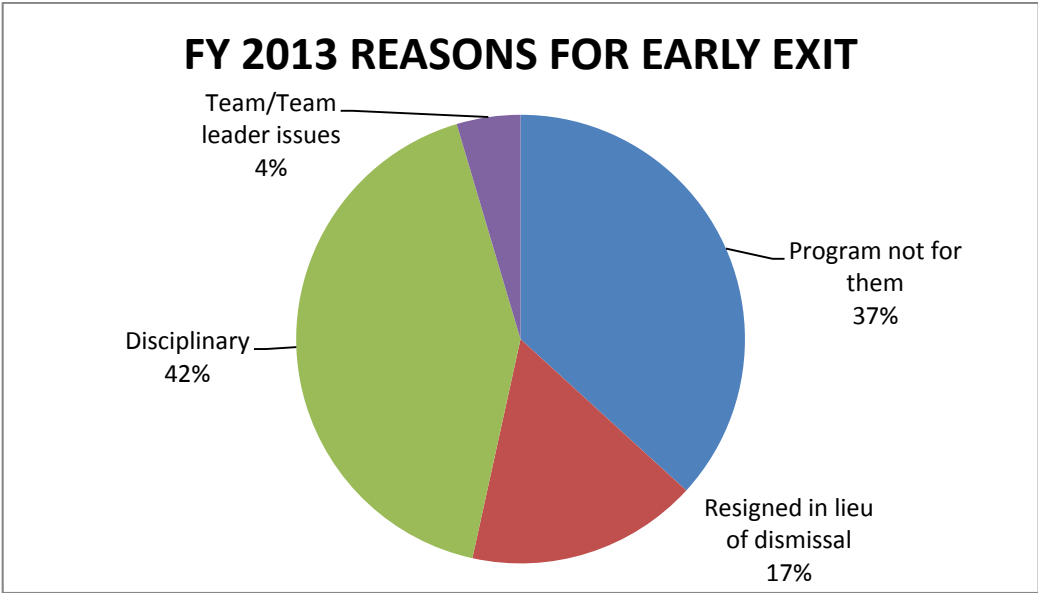
## Appendix A

FY 2012 REASONS FOR EARLY EXIT				
Campus	Program Not for Them	Resigned in Lieu of Dismissal	Disciplinary	Team/Team Leader Issues
	Members	Members	Members	Members
Atlantic	5	1	5	0
Pacific	10	3	13	0
North Central	17	8	7	7
Southwest	4	0	11	0
Southern	8	0	8	1
Totals	44	12	44	8

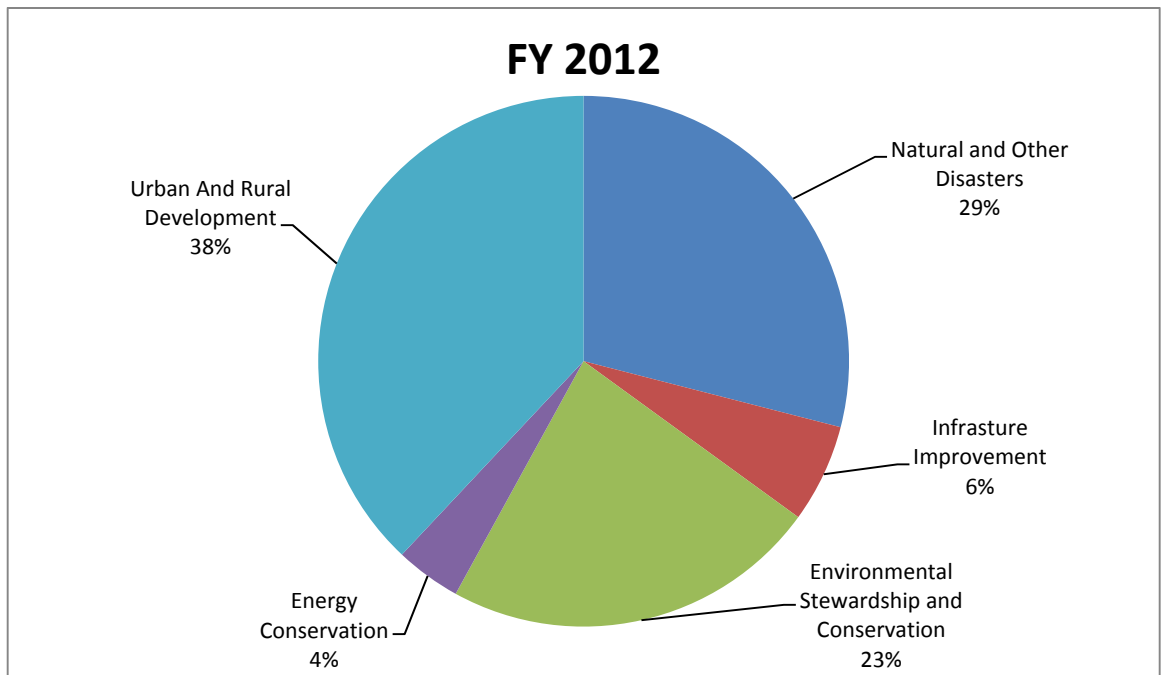
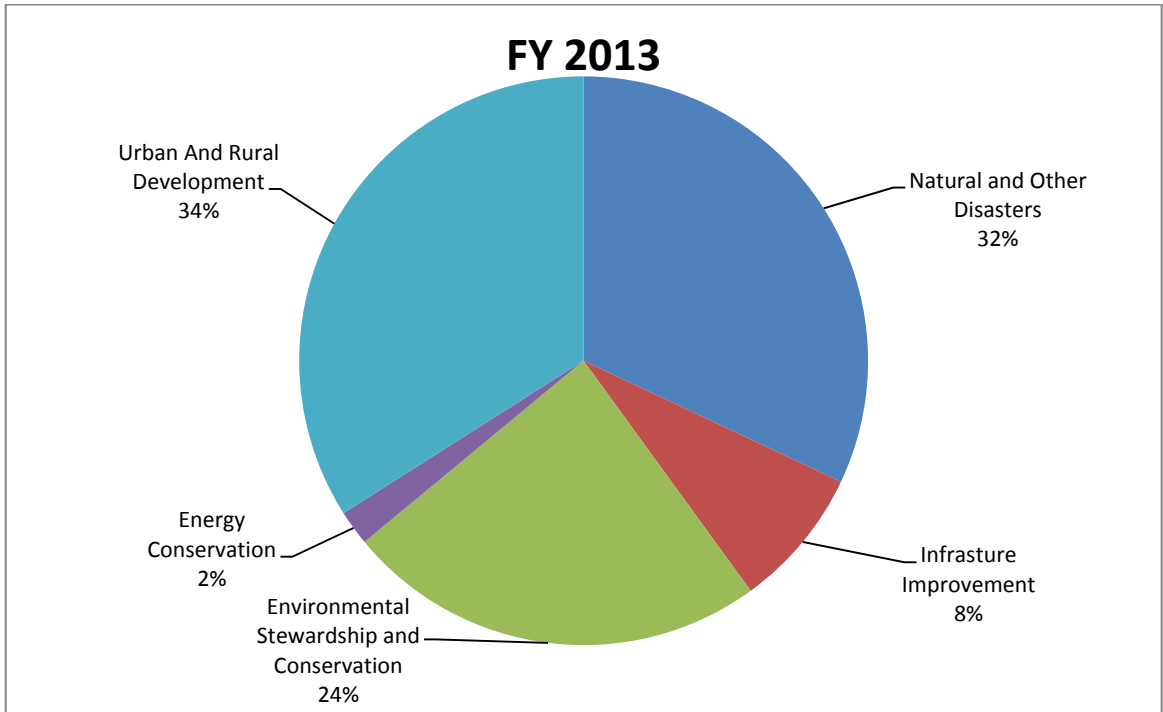




FY 2013 REASONS FOR EARLY EXIT				
Campus	Program Not for Them	Resigned in Lieu of Dismissal	Disciplinary	Team/Team Leader Issues
	Members	Members	Members	Members
Atlantic	9	4	12	2
Pacific	21	5	20	4
North Central	15	10	14	4
Southwest	13	5	25	1
Southern	6	5	2	0
<b>Totals</b>	<b>64</b>	<b>29</b>	<b>73</b>	<b>11</b>



**Appendix B**



### Appendix C

All of the campus facilities are underutilized, with the Vicksburg (Southern) campus reflecting the greatest underutilization.

<b>Regional Campus</b>	<b>Bed Capacity</b>	<b>FY 2012 Arrivals</b>	<b>FY 2012 Utilization Percentage</b>	<b>FY 2013 Arrivals</b>	<b>FY 2013 Utilization Percentage</b>
Baltimore (Atlantic)	195	162	83%	159	82%
Vinton (North Central)	285	236	83%	224	79%
Sacramento (Pacific)	375	314	84%	321	86%
Vicksburg (Southern)	372	251	67%	148	40%
Denver (Southwest)	399	328	82%	320	80%
<b>Total</b>	<b>1,626</b>	<b>1,291</b>	<b>79%</b>	<b>1,172</b>	<b>72%</b>

# Corporation for National and Community Service

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To: Stuart Axenfeld, Assistant Inspector General for Audits

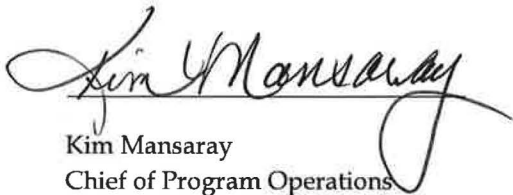
From: Kim Mansaray, Chief of Program Operations  
Gina Cross, Acting Director AmeriCorps National Civilian Community Corps

Date: November 16, 2016

Subject: Office of Inspector General (OIG) Draft Report:  
Evaluation of the AmeriCorps National Civilian Community Corps (NCCC) Program

This memorandum responds to the Office of Inspector General's (OIG's) October 3, 2016, draft report on its Evaluation of AmeriCorps National Civilian Community Corps (NCCC) Program (Draft Evaluation Report).

NCCC represents a unique, immediately deployable national service strike team capable of responding to crises at the direction of CNCS leadership and Administration needs. Unlike any other national service resource, NCCC teams can be on the ground immediately as the need is realized, with the infrastructure and flexibility to remain on the ground to support long-term operations. Direct comparisons to other national service programs are difficult and cannot adequately capture the responsiveness and flexibility unique to the NCCC program. Nonetheless, NCCC has already taken—and will continue to take—proactive steps to improve its operational efficiency and maximize its return on the federal investment. NCCC's operation, staffing, annual appropriation, and structure are a function of existing federal law. CNCS is committed to working with Congress and the Administration to maximize the efficient fielding of this unique and valuable resource.

  
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Chief of Program Operations

  
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