

Supporting Statement for Paperwork Reduction Act Submission

Semi-annual Progress Report for Grants to Indian Tribal Governments Program

A. Justification

1. Statutorily-Mandated Need for Information

The Grants to Indian Tribal Governments Program (Tribal Program) is designed to enhance the ability of tribes to respond to violent crimes against Indian women, enhance victim safety, and develop education and prevention strategies. Grantees include recognized Indian tribal governments or their authorized designees.

Currently, there are different statutory and regulatory reporting requirements that affect the Tribal Program grantees. First, the Violence Against Women Act of 2000 (VAWA 2000) requires all Violence Against Women Act (VAWA) grantees, including Tribal Program grantees, to report on the effectiveness of their programs to the Attorney General who, in turn, must report to Congress every two years. Section 1003 of VAWA 2000 states that:

(a) REPORT BY GRANT RECIPIENTS.- The Attorney General or Secretary of Health and Human Services, as applicable, shall require grantees under any program authorized or reauthorized by this division or an amendment made by this division to report on the effectiveness of the activities carried out with amounts made available to carry out that program, including number of persons served, if applicable, numbers of persons seeking services who could not be served and such other information as the Attorney General or Secretary may prescribe.

(b) REPORT TO CONGRESS.- The Attorney General or Secretary of Health and Human Services, as applicable, shall report biennially to the Committees on the Judiciary of the House of Representatives and the Senate on the grant programs described in subsection (a), including the information contained in any report under that subsection.

42 U.S.C. ' 3789.

Second, Department of Justice regulations provide that states and local and Indian tribal governments receiving federal grants must submit periodic performance reports that include a comparison of actual accomplishments to the objectives established and the reasons for slippage if the objectives were not met. 28 CFR 66.40. Department of Justice regulations likewise require grantees that are non-profit institutions to submit performance reports that include a comparison of actual accomplishments to the goals and objectives established for the reporting period and the reasons why established goals were not met and other pertinent information. 28 CFR 70.51.

Third, OVW must also comply with the statutory reporting requirements of the Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62. GPRA was enacted to increase Congressional and Administrative focus on the results of government programs and activities. To meet its GPRA reporting obligations and elicit more meaningful information about grantee performance, OVW has recently developed performance measures, including output measures, regarding which the Tribal Program grantees must report on a semi-annual basis.

2. Use of Information

OVW will use the information collected from Tribal Program grantees to monitor their grant-funded activities and qualitatively assess those activities. In particular, OVW is seeking data that includes baseline information to review activities supported with grant funds, including, for example, an increase in the number of trainings or an increase in the number of victims served.

Therefore, OVW plans to use data from the information collection in two different ways. First, OVW will review each semi-annual progress report to monitor individual Tribal Program grantees' performance and ensure that each grantee is achieving the goals and objectives set forth in its application for funding and award documents. Second, OVW will aggregate data from all Tribal Program progress reports to assess the performance of the Tribal Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how Tribal Program grantees use OVW funds.

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of Tribal Program grantees. These include OVW staff attendance at site visits, grant-funded training and technical assistance events, staff review of products prior to dissemination, and ongoing consultation with OVW staff.

Under a cooperative agreement between OVW and the University of Southern Maine's Muskie School of Public Service, data collected from OVW grantees on all of OVW's progress report forms is transmitted to the Muskie School for analysis. For the analysis of the data, standard descriptive statistics (frequency, sum, percentage, mean, etc.) are used to describe the characteristics of the grantees and report basic findings. All analyses are conducted in SPSS 13.0.

3. Use of Information Technology

The collection of information will involve the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology.

4. Duplication of Information Request

There is no other mechanism by which OVW collects information about grant funded activities including numbers of trainings, numbers of persons trained or victims served.

5. Impact on Small Businesses

There is no impact on small businesses.

6. Consequences to Federal Programs or Policy

Through the VAWA 2000, Congress has mandated that Tribal Program grantees report to the Attorney General on the effectiveness of their activities funded under VAWA. If OVW was not able to collect the information necessary to complete these reports on behalf of the Attorney General, not only would it be failing to meet a statutorily required reporting mandate, but also the existence of this important and necessary grant program could be jeopardized. The Tribal Program supports important programs that address violence against Indian women, provide victims services and trainings, and support coordinated community responses to such crimes.

7. Special Circumstances

There are no special circumstances as identified in the specific instructions for a supporting statement for Paperwork Reduction Act Submissions.

8. Federal Register Publication

OVW has consulted with persons outside the agency who have advised that the data proposed to be collected is available, the annual collection of such data is not burdensome, the form is clear, and that the information is routinely kept by most grantees receiving funds under the Tribal Program. OVW has solicited public comment on this form in accordance with the requirements of the Paperwork Reduction Act. A 60 day notice was published in the Federal Register on November 11, 2007 (Federal Register, Volume 72, page 63928) and a 30-day notice was published in the Federal Register on January 18, 2008 (Federal Register, Volume 73, page 3485).

9. Payment or Gift to Respondents

There will no payment or gift to respondents.

10. Confidentiality

Although this information is needed for a public report to Congress, it will not involve any personal information about victims that could identify them as specific individuals. However, anecdotal, non-identifying information about the effectiveness of individual programs may be included in the report. There is no assurance to confidentiality.

11. Specific Questions

The semi-annual progress report will not contain any questions of a personal, sensitive

nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Hour Burden of the Collection of Information

This semi-annual progress report is not overly burdensome. The data collection tool will be completed by approximately 85 Tribal Program grantees twice a year as there are 2 reporting periods- January 1 through June 30 and July 1 through December 31. There will be 170 annual responses and it is estimated that it will take grantees no more than 1 hour to complete the semi-annual progress report form. Thus, the annual reporting and recordkeeping hour burden is 170 hours. Tribal Program grantees are informed about the reporting requirements during the grant solicitation process and during the grant award process. Because the semi-annual progress report covers a six month period, grantees are not in a position to complete the form until the end of each reporting period.

OVW is seeking basic information that is routinely kept by the Tribal Program grantees in the normal course of their operations. Thus, the requirement that grantees complete this semi-annual progress report within a period of less than 30 days after receipt of it is not overly burdensome. OVW estimates that it will take approximately 1 hour for a grantee to complete the form. OVW developed this estimate based on the fact that information of this nature is already kept by grantees receiving funds under the Tribal Program and that the grantees have been apprized of these reporting requirements during the solicitation process and reminded throughout the grant award process. The semi-annual progress report is divided into sections that pertain to the different types of activities that grantees may engage in, i.e., training, technical assistance, law enforcement activities, and victim services. Grantees will only have to complete the sections of the form that relate to their specific activities.

13. Cost Burden of the Collection of Information

OVW does not believe that there is any annual cost burden on respondents or recordkeepers resulting from the collection of this information.

14. Annualized Costs to the Federal Government

OVW does not believe that there are any annualized costs to the Federal Government resulting from the collection of this information beyond those costs associated with the routine management, monitoring, and oversight of the Tribal Program.

15. Program Changes or Adjustments

There are no program changes or adjustments for the estimates identified in Section 13 and in Section 14. This is a information collection that is necessary for OVW and its Tribal Program grantees to comply with the statutory reporting requirements of 42 U.S.C. 3789 and the Government Performance and Results Act of 1993 (Pub. L. 103-62).

16. Published Results of Information Collections

There will be no complex analytical techniques used in connection with the publication of information collected under the request. Information will be gathered twice a year at the end of the reporting periods, January 1 through June 30 and July 1 through December 31. OVW is statutorily required to submit a report on the effectiveness of grant-funded activities on a biennial basis.

17. Display of the Expiration Date of OMB Approval

OVW will display the Expiration Date of OMB Approval in the upper right hand corner of the Semi-annual Progress Report.

18. Exception to the Certification Statement

OVW is not seeking any exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions, of OMB Form 83-I.