

Supporting Statement for Paperwork Reduction Act Submission

Annual Progress Report for STOP Violence Against Women Formula Grant Program

A. Justification

1. Statutorily-Mandated Need for Information

The primary goal of the STOP (Services*Training*Officers*Prosecutors) Violence Against Women Formula Grant Program (STOP Program) is to develop and strengthen the criminal justice system's response to violence against women and to support and enhance services for victims. The STOP program was authorized through the Violence Against Women Act (VAWA) of 1994 and reauthorized and amended by the VAWA of 2000 and by the VAWA of 2005. Grant awards are made to state governments and administered through a STOP state administrator. Each state and territory must allocate OVW grant funds to law enforcement, prosecution, courts, and victim services within the statutory parameters. Eligible applicants for the STOP Program include any state within the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands.

Currently, there are different statutory and regulatory reporting requirements that affect the STOP Program grantees. First, VAWA 2000 requires all VAWA grantees, including STOP 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.

In addition, VAWA requires the Attorney General to report, not later than 180 days after the end of each fiscal year, to the House and Senate Judiciary Committees on:

- (1) the number of grants made and funds distributed under the STOP (Services* Training* Officers* Prosecutors) Violence Against Women Formula Grant Program grants;
- (2) a summary of the purposes for which those grants were provided and an evaluation of their progress;
- (3) a statistical summary of persons served, detailing the nature of victimization, and providing data on age, sex, relationship of victim to offender, geographic distribution, race, ethnicity, language, and disability; and
- (4) an evaluation of the effectiveness of programs funded.

42 U.S.C. ' 3796gg-3(b).

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 66.40¹

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 STOP Program grantees must report on a annual basis.

2. Use of Information

OVW will use the information collected from STOP 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 any 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 progress reports to monitor STOP state Administrator's performance and ensure that each program is achieving the goals and objectives set forth in its application for funding, performance plan and award documents. Second, OVW will aggregate data from all progress reports to assess the performance of the STOP Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how STOP Program uses OVW funds.

1 In addition, VAWA requires that A[U]pon completion of the grant period..., a State or Indian tribe shall file a performance report with the Attorney General explaining the activities carried out, which report shall include an assessment of the effectiveness of those activities in achieving the purposes of this part. @ 42 U.S.C. 3796gg-1(h).

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of STOP Program subgrantees. 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 and VAWA 2000, Congress has mandated that STOP state Administrators 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 STOP Program supports important programs that provide critical training to address violence against women, provide victims services, and support coordinated community responses to such crimes. The STOP Program promotes a coordinated, multi-disciplinary approach to improving the criminal justice system's response to violence against women and supports partnerships among law enforcement, prosecution, courts, and victim advocacy organizations to enhance victim safety and to increase offender accountability.

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 all STOP state Administrators and subgrantees receiving funds under the STOP 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 March 18, 2008 (Federal Register, Volume 73, page 14486) and a 30-day notice was published in the Federal Register on May 23, 2008 (Federal Register, Volume 73, page 30164). OVW did not receive public comments in response to these Federal Register publications.

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 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 annual progress report is not overly burdensome. The data collection tool will be completed by 56 STOP state administrators and approximately 2,500 subgrantees once a year. There will be 2,556 annual responses and it is estimated that it will take STOP state administrators and subgrantees no more than 1 hour to complete the annual progress report form. It is also estimated that an additional 30% of the subgrantees will complete additional optional narrative questions and that it should take them no longer than 20 minutes to complete those additional optional questions. Therefore, the total estimated hour burden of this information collection is 2,806 hours (2,556 hours for STOP state administrators and subgrantees and approximately 250 hours for the 30% of the subgrantees OVW expects will complete the optional narrative questions). The reason for the burden increase is due to an additional 30 percent increase in some respondents answering the additional optional questions. STOP state administrators are informed about the reporting requirements during the grant solicitation process and during the grant award process.

OVW is seeking basic information that is routinely kept by the STOP state administrators

and subgrantees in the normal course of their operations. OVW estimates that it will take approximately 1 hour for a subgrantee to complete the form and 80 minutes for the 30% of subgrantees who opt to complete the additional narrative questions. OVW developed this estimate based on the fact that information of this nature is already kept by STOP state administrators and subgrantees and that the STOP state administrators have been apprized of these reporting requirements during the solicitation process and reminded throughout the grant award process. The annual progress report is divided into sections that pertain to the different types of activities that subgrantees may engage in, i.e. training, developing a protection order database, and the different types of subgrantees that receive funds, i.e. law enforcement agencies, prosecutors' offices, courts, victim services agencies, etc. Subgrantees will only have to complete the sections of the form, including the optional narrative questions, that relate to their specific grant-funded 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 STOP Program.

15. Program Changes or Adjustments

The total estimated hour burden of this information collection is 2,806 hours (2,556 hours for STOP state administrators and subgrantees and approximately 250 hours for the 30% of the subgrantees OVW expects will complete the optional narrative questions). The reason for the burden increase is due to an additional 30 percent increase in some respondents answering the additional optional questions. This is a information collection that is necessary for OVW and its STOP Program grantees to comply with the statutory reporting requirements of 42 U.S.C. 3796gg, 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 once a year at the end of the reporting periods, January 1 through December 31. OVW is statutorily required to submit a report on the effectiveness of grant-funded activities on a biennial basis.

16. 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 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.