

## **Supporting Statement for Paperwork Reduction Act Submission**

### Office on Violence Against Women Solicitation Template

#### A. Justification

##### 1. Statutorily-Mandated Need for Information

The Office on Violence Against Women (OVW) administers financial support and technical assistance to communities around the country that are creating programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault and stalking. Its mission is to provide national leadership to improve the Nation's response to these crimes through the implementation of the Violence Against Women Act of 1994 (VAWA), the Violence Against Women Act of 2000, and the Violence Against Women Act of 2005. OVW pursues this mission by supporting community efforts, enhancing education and training, disseminating best practices, launching special initiatives, and leading the Nation's efforts to end violence against women.

Currently, OVW administers 2 formula grant programs and 17 discretionary grant programs, all of which were established under VAWA and subsequent legislation. Since its inception in 1995, OVW has awarded nearly \$3.5 billion in grants and cooperative agreements and has launched a multifaceted approach to implementing VAWA. These grant programs are designed to develop the nation's capacity to reduce domestic violence, dating violence, sexual assault, and stalking by strengthening services to victims and holding offenders accountable for their action. OVW posts grant program solicitations, closes solicitation periods, performs initial internal reviews, conducts peer reviews, makes funding decisions and ultimately makes awards on a staggered basis by grant program according to a master calendar that ensures that grant awards are made in a timely manner in a specific fiscal year. The date of the posting of a solicitation is set by working backwards from the date that OVW is required to award grant funds.

OVW developed a solicitation template and an accompanying Grant Program Reference Guide to assist potential grantees in applying for current OVW programs. The solicitation template ensures that all applicants to OVW grant programs will be asked to provide uniform information in a consistent manner. The information addressed in the solicitation template includes: Application for Federal Assistance; Standard Assurances and Certifications; Financial Accounting Practices; Summary Data Sheet; Proposal Abstract; Summary of Current OVW Projects; Project Narrative; Budget Detail Worksheet and Narrative; Memorandum of Understanding (MOU); Letter of Nonsupplanting; Financial Capability Questionnaire; and Indirect Cost Rate Agreement. Each solicitation will then be tailored to address the specific OVW grant program so that identification of eligible applicants, availability of funds, award period, award amount, program scope, activities that may compromise victim safety and recovery and unallowable activities will be consistent with the statutory requirements and funding amounts authorized for each particular grant program.

OVW is seeking expedited, emergency review and approval of the solicitation template by November 1, 2009 so that OVW can meet its Fiscal Year deadlines of posting solicitations, reviewing applications and making grant awards.

2. Use of Information

OVW will use the information collected to make determinations about grant awards. The solicitation template is designed so that applicants will be asked to provide specific information in a consistent manner. For example, in the Project Narrative Section of the solicitation, all applicants will be asked to include descriptions of the purpose of application, what will be done and who will implement in a separate attachment to the application that may not exceed 20 pages in length, double spaced.

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

In order to make federal funding decisions, OVW collects information through the submission of applications to its grant programs after posting the solicitations online. The only mechanism to apply for funding under the OVW grant programs is participation in the solicitation process.

5. Impact on Small Businesses

There is no impact on small businesses.

6. Consequences to Federal Programs or Policy

The solicitation process including the collection of information from grant programs applicants in a consistent and uniform manner and the utilization of specified selection criteria ensures that federal funding decisions are made in an appropriate, equitable, and effective manner consistent with the statutorily authorized purposes of the VAWA grant programs and with the funding authorizations from Congress.

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 information proposed to be collected is available to potential grantees, the annual collection of and submission of such information is not burdensome, and the solicitation template is clear. In connection with the expedited, emergency review and approval of this information collection, OVW has solicited public comment on this form in accordance with the requirements of the Paperwork Reduction Act. A 30-day notice was published in the Federal Register on October 5, 2009 (Federal Register, Volume 74, page 51170).

OVW received 2 public comments from the same individual in response to the Federal Register publication. The comments addressed the opinion that federal funds should not be used for work that is already done at the local, county and state level.

In recognition of the severity of the crimes of domestic violence, sexual assault and stalking and the inconsistent response across the country at the state and local level, Congress passed the Violence Against Women Act of 1994 (VAWA 1994) as part of the Violent Crime Control and Law Enforcement Act of 1994. VAWA was landmark legislation designed to improve criminal justice responses to domestic violence, sexual assault, and stalking and to increase the availability of services for victims of these crimes with federal funding. The federal law takes a comprehensive approach to violence against women by combining tough new penalties to prosecute offenders while implementing grant programs to aid the victims of such violence. The Violence Against Women Act of 2000 (VAWA 2000) and the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA 2005) reauthorized the grant programs created by the original VAWA and subsequent legislation, as well as established new programs.

9. Payment or Gift to Respondents

There will no payment or gift to respondents.

10. Confidentiality

Although this information is needed for funding decisions, 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 solicitation template 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

The collection of the information addressed in this solicitation template is not overly burdensome. Solicitations will be completed by approximately 1800 applicants once a year. There will be 1800 annual responses and it is estimated that it will take applicants approximately 30 hours to complete an application

OVW is seeking information that is necessary to make determinations about funding decisions and the solicitation template requires applicants to provide this information in a consistent and uniform manner across the different grant programs. OVW estimates that it will take approximately 30 hours for applicants to complete an application package. OVW developed this estimate based on past experiences during the solicitation and award process.

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 other than the staff time devoted to developing and drafting a response to the solicitation.

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 administration and management of the OVW grant programs.

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 an information collection that is necessary for OVW to make funding decisions.

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 during the solicitation process.

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 solicitations.

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.