

Supporting Statement for Paperwork Reduction Act Submission

Semi-Annual Progress Report for the Grants to Enhance Culturally and Linguistically Specific Services for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

A. Justification

1. Statutorily-Mandated Need for Information

The Grants to Enhance Culturally and Linguistically Specific Services for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking (Culturally and Linguistically Specific Services Program), created by the Violence Against Women Act of 2005 (VAWA 2005), will fund projects that promote the maintenance and replication of existing successful domestic violence, dating violence, sexual assault, and stalking community-based programs providing culturally and linguistically specific services and other resources. The program also will support the development of innovative culturally and linguistically specific strategies and projects to enhance access to services and resources for victims of violence against women.

Office on Violence Against Women (OVW)-funded projects will include those that increase a community's capacity to provide culturally and linguistically specific resources and support for victims of domestic violence, dating violence, sexual assault, and stalking; strengthen criminal justice interventions by providing training for law enforcement, prosecution, courts, probation, and correctional facilities on culturally and linguistically specific responses to crimes of violence against women; and enhance traditional victims services through the leadership of culturally and linguistically specific programs. The Culturally and Linguistically Specific Services Program will also support projects that provide culturally and linguistically specific services for children exposed to domestic violence, dating violence, sexual assault, and stalking and that offer culturally and linguistically specific resources and services that address safety, economic justice, housing, and workplace needs of victims.

The Culturally and Linguistically Specific Services Program is funded through five percent of the appropriated amount for each of the following VAWA grant programs: Legal Assistance for Victims; Rural Domestic Violence, Dating Violence, Sexual Assault and Stalking Assistance; Enhanced Training and Services to End Violence Against and Abuse of Women in Later Life; Education, Training, and Enhanced Services to End Violence Against and Abuse of Women with Disabilities; and the Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program. These funds will be distributed for the first time in Fiscal Year 2009.

Currently, there are different statutory and regulatory reporting requirements that affect Culturally and Linguistically Specific Services Program grantees. First, VAWA 2000 requires all VAWA grantees, including Culturally and Linguistically Specific Services 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, 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 Culturally and Linguistically Specific Services Program grantees must report on a semi-annual basis.

2. Use of Information

OVW will use the information collected from all Culturally and Linguistically Specific Services Program grantees to monitor their grant-funded activities and 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 persons trained, number of victims served.

Therefore, OVW plans to use data from the proposed information collection in two different ways. First, OVW will review each semi-annual progress report to monitor individual Culturally and Linguistically Specific Services 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 Culturally and Linguistically Specific Services Program progress reports to assess the performance of the Culturally and Linguistically Specific Services Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how Culturally and Linguistically Specific Services 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 Culturally and Linguistically Specific Services 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 number of victims served, victims seeking services who could not be served or persons trained.

5. Impact on Small Businesses

There is no impact on small businesses.

6. Consequences to Federal Programs or Policy

Through VAWA 2000, Congress has mandated that all OVW grantees, including Culturally and Linguistically Specific Services Program grantees, report to the Attorney General on the effectiveness of their activities funded under VAWA, including the number of victims served and the number of victims who could not be served. 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 Culturally and Linguistically Specific Services Program supports important programs that provide culturally and linguistically specific services to victims and critical training to assist law enforcement officers, prosecutors, and relevant officers of Federal, State, tribal, and local courts.

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 Culturally and Linguistically Specific Services 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 July 17, 2009 (Federal Register, Volume 74, page 34786) and a 30-day notice was published in the Federal Register on September 18, 2009 (Federal Register, Volume 74, page 47959).

On September 18, 2009, the Department of Justice received one public comment that stated that the linguistically challenged are illegal immigrants and that American tax dollars should not be going to people who are lawbreaking immigrants.

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 50 Culturally and Linguistically Specific Services 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 100 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 100 hours. Culturally and Linguistically Specific Services 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 Culturally and Linguistically Specific Services 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 Culturally and Linguistically Specific Services 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, product development, 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 Culturally and Linguistically Specific Services 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 Culturally and Linguistically Specific Services 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.