

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

### Semi-Annual Progress Report for the Services to Advocate for and Respond to Youth Program

#### **A. Justification**

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

The Services to Advocate for and Respond to Youth Program (Youth Services Program) is the first Federal funding stream solely dedicated to the provision of direct intervention and related assistance for youth victims of sexual assault, domestic violence, dating violence and stalking. Overall, the purpose of the Youth Services Program is to provide direct counseling, advocacy, legal advocacy, and mental health services for youth victims of sexual assault, domestic violence, dating violence, and stalking, as well as linguistically, culturally, or community relevant services for underserved populations. Youth victims of sexual assault, domestic violence, dating violence and stalking require specialized services designed to meet the specific needs of youth and young adults. While these crimes affect women regardless of their age; youth are especially vulnerable and face unique obstacles if they decide to seek help. Unlike many adults, youth may not have access to money, transportation, child-care or to safe shelter. Additionally, youth and young adults may be inexperienced with dating and may mistake potential abusive behavior such as jealousy as a sign of love. Furthermore, in working with youth and young adults, there are concerns regarding lack of confidentiality and when or if to involve child protective services in cases of assault. Procedures and policies are necessary to develop and enhance mandatory reporting laws in each State and to address the need for parental notification and consent guidelines.

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

## 2. Use of Information

OVW will use the information collected from all Youth 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. OVW needs to collect this information from grantees every six months- it ensures that our OVW program specialists know what is going on with their grantees within a shorter time period. All of the OVW discretionary program grantees report on a semi-annual basis and we want this reporting requirement to be consistent across the OVW grant programs. For technical purposes, semi-annual reporting also enables us to review the information to ensure accuracy in reporting and get the data to our Technical Assistance provider so this information is available for reporting purposes- both for Congressional reporting requirements as well as performance measures needed in the Budget process.

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 Youth 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 Youth Services Program progress reports to assess the performance of the Youth Services Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how Youth 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 Youth 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 Youth 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 Youth Services Program supports the provision of direct intervention and related assistance for youth victims of sexual assault, domestic violence, dating violence and stalking.

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 Youth 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 May 18, 2010 (Federal Register, Volume 75, page 27820) and a 30-day was

notice was published in the Federal Register on July 20, 2010 (Federal Register, Volume 75, page 42126).

On July 20, 2010, the Department of Justice received one public comment that stated that this program should be cut because the federal budget is too large and that federal funds would be better spend on border control.

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 45 Youth 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 90 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 90 hours. Youth 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 Youth 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 Youth 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 Youth 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 Youth 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.

