

Information Collection Request

**Supporting Statement for the
Violence and Victimization Experiences of
Indian Women Living in Tribal Communities Project**

**Also known as the
Violence Against Indian Women (VAIW) Pilot study**

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Abstract

The Violence and Victimization Experiences of Indian Women Living in Tribal Communities Study (also known as the Violence Against Indian Women [VAIW] pilot study) is part of a program of research at the National Institute of Justice (NIJ) seeking better information on physical violence, sexual violence, and stalking perpetrated against American Indian and Alaska Native (AI&AN) women living in tribal communities. Accurate, comprehensive, and current information on the incidence, prevalence, and nature of intimate partner violence, sexual violence, and stalking in Indian Country and Alaska Native communities is critically needed to improve understanding of the programmatic, service, and policy needs of victims and to educate and inform policymakers and the public about this pervasive threat to the health and well-being of AI&AN women. Information is also needed on victims' experiences with and opinions of the services they receive from health providers and justice authorities, as well as their reasons for not seeking them.

Despite compelling indications that rates of violence in AI&AN communities merit serious attention, there is a dearth of research regarding violence against AI&AN women in Indian Country. Although data on intimate partner violence, sexual violence, and stalking are readily available on non-AI&AN women, the lack of data on AI&AN women living in tribal communities means little is known about the magnitude of these problems, the service needs of victims, and the satisfaction with services among women in Indian Country.

The VAIW pilot study aims to:

1. Create and pilot test a survey instrument with women who [self-report as AI or AN who reside on recognized tribal lands in the U.S.](#) that captures valid, reliable data on the nature and extent of intimate partner violence, sexual violence, and stalking committed against AI&AN women; and
2. Develop and test a study methodology, including different sampling strategies and data collection approaches, that enable the safe collection of data, and analysis of results, which can then be generalized to AI&AN women, aged 18 or over, residing on tribal lands.

At the end of the pilot study, [NIJ will have considerably more knowledge, tools, experience, and methods to coordinate and field a larger study](#) as supported by the Violence Against Women Act of 2005, Public Law Number 109-162, Title IX, Section 904(a).

A. SUPPORTING STATEMENT JUSTIFICATION

A.1. Circumstances Making the Collection of Information Necessary

This is a New Information Collection Request.

A.1.a) Background

(i) Limitations of Existing Data on Violence Against AI&AN Women in Indian Country

Methodologically rigorous research and data are needed on the incidence and prevalence of intimate partner violence, sexual violence, and stalking among AI&AN women in Indian Country¹. Data are also needed on the service needs of and service utilization by AI&AN victims, as well as on their experiences with and opinions of these services and their reasons for not seeking them.

Although these data are readily available on non-AI&AN women, the lack of comparable data on AI&AN women living in tribal communities means little is known about the magnitude of these problems, the service needs of victims, and the satisfaction with services among women in Indian Country. This endeavor is particularly crucial in the wake of the Tribal Law and Order Act (TLOA), signed into law in July 2010. The TLOA changes how federal government agencies are expected to deliver law enforcement, prosecution and correctional services in Indian Country, and is designed to increase American Indian and Alaska Native victims' access to justice system resources in Indian Country. In addition, the TLOA imposes higher standards on tribal nations for the reporting of crimes to federal law enforcement and prosecution, including crimes of violence against women.

Despite compelling indications that rates of sexual and intimate partner violence in AI&AN communities merit serious attention (see A1a(ii), below), there is clearly a dearth of research regarding violence against AI&AN women in Indian Country. Existing research samples of AI&AN women are not large enough or sufficiently representative. For example, the conclusions from the National Violence Against Women Survey (NVAWS) were based on data collected from a sample of 88 self-identified AI&AN women (Tjaden & Thoennes, 2000). Most important, many studies that have included AI&AN women do not produce comprehensive information and are not well designed to capture sensitive, culturally appropriate data on issues like intimate partner violence, sexual violence, and stalking. Further, among existing large-scale studies of violence against women, sampling approaches have failed to capture the experiences of women living in Indian Country and have classified respondents as AI&AN based on racial self-identification rather than tribal enrollment, affiliation, or residency on tribal lands. As a result, many questions remain about the health and safety of AI&AN women in Indian Country.

¹ "Indian Country" is defined by 18 U.S.C. 1151 as follows: . . . (a) all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and including the rights-of-way through the reservation, (b) all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state, and (c) all Indian allotments, the titles to which have not been extinguished, including rights-of-way running through the same.

(ii) Circumstances Making This Information Collection Necessary

As detailed above, existing data and knowledge regarding violence against AI&AN women in Indian Country are insufficient. However, findings from preliminary research in this area indicate that it merits further attention.

Various studies have suggested that violence against women is more widespread and severe in American Indian and Alaska Native communities than among other North American people (e.g., Fairchild, Fairchild, & Stoner, 1998; Robin, Chester, & Rasmussen, 1998; Oetzel & Duran, 2004). NVAWS found that self-identified AI/AN women were significantly more likely than women from all other backgrounds to have been raped and/or stalked at some point in their lifetimes (Tjaden & Thoennes, 2006). According to estimates from the National Crime Victimization Survey (NCVS), self-identified American Indian and Alaska Native women experienced the highest rate of intimate partner victimization (18.2 percent), compared to 6.3 percent among white women, 8.2 percent among African American women, and 1.5 percent among Asian American women (Catalano, 2007)². Recently, researchers at the University of Alaska at Anchorage reported that the incidence of domestic violence among Alaska Native women was 8-12 times higher than among non-Alaska Native women (Rivera, 2010).

Robin, Chester, and Rasmussen (1998) found that in a sample of almost 600 AI/AN persons, 91 percent of women reported experiencing some form of intimate partner violence. Verbal and physical violence in a relationship were experienced by approximately 75 percent of women, and 16 percent of women reported forced sex by a partner. Almost half of the women reported needing medical care from injuries sustained during an episode of partner violence, and a little over a third reported incidents that involved their children. Among all assault injuries reported by ambulatory and emergency services on one southwest tribal reservation, one in four was due to intimate partner violence (Kulklinski & Buchanan, 1997).

In a relatively large study of women from six American Indian tribes (n=1,368), Yuan, Koss, Polacca, and Goldman (2006) found that 45 percent reported being physically assaulted and 14 percent had been raped since turning 18 years old. Factors associated with being raped included marital status, childhood maltreatment, and lifetime alcohol dependence. In a study of Athabaskan women residing in the interior of Alaska, almost two thirds of respondents reported experiencing intimate partner violence in their lifetime, and 18 percent of the respondents reported experiencing intimate partner violence in the past year (Wood & Magen, 2009). With a small sample (n=30) of Native American women, Bohn (2003) found that almost half experienced physical and/or sexual

² Although the NCVS does collect victimization data from “self-identified” American Indian and Alaska Native (AI/AN) people, the NCVS cannot be used to produce reliable estimates of violence against Indian women, either on or off reservations. The NCVS sample does include some households in Indian Country, but these households do not constitute a representative sample for Indian Country, nor is the number of sample cases sufficient to produce reliable estimates of crime victimization in Indian Country. For this reason, NCVS data do not provide tribal specific crime rates or estimates of crime in Indian country—reservations, tribal communities, and trust land. With respect to AI/AN victimizations outside Indian Country, NCVS samples sizes are so small that the AI/AN category is collapsed into an ‘other’ category for both single year and multiple year data collection efforts. In aggregating multiple years, the NCVS AI/AN sample is not sufficient to produce reliable estimates of crimes against AI/AN women (e.g., less than 50 respondents over a ten-year period).

abuse as children, over half were sexually abused in their lifetime, over three quarters were abused by a partner, and 87 percent experienced physical or sexual abuse in their lifetime.

Further, elevated rates of substance use, particularly alcohol abuse, in many AI&AN communities could put women at increased risk for violent victimization. Approximately one quarter to one third of adult AI&AN persons have had a substance use problem in the past year, and as many as three quarters of males and 40 percent of females experience lifetime substance use disorders (Bray, Dalberth, Herman-Stahl, Walker, & Sanchez, 1999; Herman-Stahl & Chong, 2002; Kinzie, Leung, Boehnlein, Matsunaga, Johnson, Manson, Shore, Heinz, & Williams, 1992; Leung, Kinzie, Boehnlein, & Shore, 1993; Manson, Shore, Baron, Ackerson, & Neligh, 1992). Substance use and abuse increases the risk and severity of many forms of violence, including intimate partner violence (Fagan, Barnett, & Patton, 1988; Fals-Stewart & Birchler, 1998; Norton & Manson, 1995; White & Chen, 2002). Bohn (2003) found significant relationships between childhood abuse, substance abuse, and adult re-victimization, and among cumulative lifetime abuse events, substance abuse, and depression. In a study of 234 AI&AN female primary care patients, results indicated that unadjusted prevalence ratios for severe physical or sexual abuse (relative to no intimate partner violence) were significant for anxiety, posttraumatic stress disorder (PTSD), mood, and any mental disorder. Adjusted prevalence ratios showed severe physical or sexual intimate partner violence to be associated with mood disorders (Duran, Oetzel, Parker, Malcoe, Lucero, and Jiang, 2009).

A study by Hamby (2008) investigated help-seeking behavior by victimized AI&AN women. AI&AN women identified numerous barriers to reporting their victimization or seeking services, including distrust of law enforcement, prejudice, conflict between Western and traditional Native American values and language barriers. In a study of perceptions and opinions about intimate partner violence, Tehee and Esqueda (2008) found that American Indian women and European American women had different conceptualizations of what constitutes and causes intimate partner violence. American Indian women tended to identify external causes, whereas European American women tended to emphasize the role of internal factors. These findings speak to the importance of a study like the one being proposed, which is designed with the AI&AN women's experiences, perspective, needs, and concerns in mind. Only with results from such a study can high-quality data be collected and barriers to reporting and service-seeking be addressed and overcome.

(iii) *Specific Mandate to Study Violence Against Women in Indian Country*

The Violence Against Women Act of 2005 (VAWA 2005), Public Law Number 109-162 (codified at 42 U.S.C. § 3796gg-10 note), Title IX, Section 904(a) mandates the National Institute of Justice (NIJ) conduct analyses and research on violence against Indian Women in Indian Country (see Attachment A) . In consultation with the Office on Violence Against Women (OVW), NIJ is mandated to conduct a National Baseline Study that focuses on domestic violence, dating violence, sexual assault, stalking, and murder. In order to conduct this National Baseline Study in an effective and resource-efficient manner, it is important to first develop and pilot test a survey instrument and survey methods (including sampling approach and survey mode).

A.1.b) Privacy Impact Assessment

(i) Overview of Data Collection System

The VAIW pilot study was developed by NIJ and RTI International and will be conducted by RTI International staff in partnership with NIJ and tribal stakeholders.

We are planning to work with three different pilot sites, each of which will be designed to address distinct and somewhat separate goals. The site protocols and the goals we hope to achieve with each are outlined below:

- Pilot site #1 will be used to test the viability of using a map-based approach to sample households on reservation lands. In places where no sampling frame or list from which to sample exists (e.g., tribal enrollment log), or when such lists cannot be shared, a map-based approach for enumerating and sampling households may be a cost-effective method of sampling. However, this approach is relatively new and we recognize the need to validate the map-based approach. In pilot site #1, we will undertake two independent household enumeration activities. Testing these two sample designs will allow us to evaluate the scientific robustness, burden to infrastructure, and cost of each, and, where appropriate, consider an approach that may combine elements of both designs for maximum efficiency.

First, we will use a map-based approach to identify and enumerate all household units in a predefined area of the reservation (e.g., a 5 square mile area). This will be done by predefining the area and studying aerial photographs of the area. In studying the aerial photographs, we will enumerate and document the location of (i.e., count and geocode) every dwelling unit that we believe is a household based on observable photographic evidence. Second, we will travel to the predefined area and work with our tribal contacts to undertake more traditional counting and listing. Counting and listing is a proven method for enumerating households and is widely used on numerous respected research studies. As such, we are viewing counting and listing as a gold standard against which the map-based approach can be credibly compared.

Once we have enumerated households in the predefined area of the reservation using the map-based and the counting and listing approaches, we will compare our findings in an effort to determine the extent of overlap and the magnitude of the difference between the two approaches. We could envision either approach outperforming the other by identifying more potential households. Such a head-to-head comparison will help us to know whether the map-based approach has promise for sampling in Indian Country sites where list-based sampling is not viable. Comparing the map-based approach to traditional, proven counting and listing methods will be instructive on this pilot study and for the field.

- Pilot Site #2 will be a small, but full scale pilot test of all components of a field-based data collection study. The plan for this site involves a number of interrelated activities that include: randomly sampling potential respondents (i.e., American Indian women who are at

least 18 years of age) from an enrollment list provided by the tribal government³; assessing the accuracy of the enrollment list provided by the tribe; recruiting, hiring, and training field interviewers to interview American Indian women who are at least 18 years of age about their victimization experiences; contacting and recruiting up to 140 respondents to participate in a touchscreen audio computer-assisted self-interview (ACASI) about their victimization experiences that will last between 40 and 80 minutes (mean = 60 minutes); administering informed consent procedures and ensuring respondents are comfortable and receive answers to their questions; providing an incentive (\$35) to respondents who complete the interview (N=35); and working with tribal partners to ensure that the study is implemented such that the safety and service needs of interviewers and respondents are met and maintained. The pilot test activities in site #2 will thus include all aspects of a field study, start to finish.

- Pilot Site #3 will be limited to cognitive testing of the survey instrument and the consent form, and collecting information about confidentiality issues, the potential for telescoping on the 12-month estimates, and respondent preferences for data collection mode and interviewer characteristics. A report summarizing the results of our previous cognitive interviewing activities is included with this submission. For this pilot site, we are planning to conduct cognitive interviews with 15 to 20 Alaska Native women who are at least 18 years of age. The cognitive testing will include women who have and have not experienced physical violence, sexual violence, and/or stalking. We will work with service providers in two to three rural sites in Alaska to identify and recruit potential respondents using convenience methods. We will conduct the cognitive interviews in spaces provided by the service providers and we will pay respondents \$40 for a 90-minute cognitive interview. We will conduct traditional cognitive interviewing to evaluate the latest survey instrument and the consent form (which have been revised to incorporate findings from the first round of cognitive interviews), and we will ask respondents about their concerns about confidentiality. Staff will also explore which way of describing legal protections afforded to respondents are more reassuring, including references to OJP's statute, etc. When respondents report victimization in the past 12 months, we will delve into how respondents placed their victimization experiences in time. The purpose of these conversations will be to determine whether respondents have trouble bounding in time when victimization occurred and to assess the extent to which telescoping (i.e., reporting an event that occurred 12 months or more ago in the "past 12 months" reference period) might threaten the quality of the data we collect for the 12-month reference period.

To explore issues related to respondent preferences for data collection mode, we will route cognitive interviewing respondents through a survey module in ACASI so they have direct experience with that mode. We will then ask a series of questions designed to capture how respondents feel about ACASI and whether they might prefer another mode when being asked sensitive questions. Finally, to determine whether Alaska Native women are likely to

³ The proposed pilot site #2 tribal government has offered to provide their most current tribal enrollment list which is updated as new members are added (mostly newborns or those that were not previously enrolled). The information provided includes members' full name, DOB, complete physical address, and phone number. During the recruitment of potential respondents, study staff will annotate any discrepancies. Based on the current tribal list provided to study staff for review, we plan to randomly select 140 adult American Indian women from the list who are currently living in the tribal community with a goal of completing approximately 35 interviews from women who volunteer to participate in the pilot study.

prefer interacting with interviewers who have certain characteristics (e.g., being Alaska Native, being from a particular village, being of a certain age), we will conduct a focus group with a set of rural Alaska grantees who work with Alaska Native victims (and who meet regularly). We will meet with this group and pose a number of questions about what they think will be most important to Alaska Native women when deciding whether or not to participate in a study on victimization or how to respond to particularly sensitive questions. Based on the experience of our project consultant, Dr. André Rosay, who continues to work closely with this group, we believe the rural grantees will be very candid, culturally competent, and knowledgeable. Their input will be helpful in our efforts to understand the concerns and preferences of Alaska Native women when it comes to things like data collection mode and interviewer characteristics.

VAIW Pilot Study activities will be conducted in three sites in late 2011 and early 2012. All aspects of the VAIW Pilot Study activities will be closely monitored in an effort to ensure that the goals of the pilot study are being served.

(ii) *Items of Information to Be Collected*

For this Information Collection Request, no individually identifiable information that can be linked to the survey data will be maintained. For pilot site #1, no individually identifiable information will be collected or maintained. For pilot site #2, sample frame information used for locating prospective respondents will be destroyed as soon as all interviews with sampled women have been completed. For pilot site #3, information on prospective respondents is [maintained by service providers and sampling properties have been analyzed to inform strategy comparisons](#). Study staff will not receive identifiable information from cognitive interviews.

In sites #2 and #3, the types of victimization that will be asked about include physical violence, psychological aggression, coercive control, sexual violence, and stalking. The survey will gather information regarding experiences that occurred across the lifespan and within the 12 months preceding the survey. These victimization questions have been adapted from the OMB-approved National Intimate Partner and Sexual Violence Surveillance System (NISVS), OMB control number 0920-0822. Respondents who indicate having experienced any of these forms of victimization in the last 12 months will be asked a series of follow-up questions regarding reporting, service needs and utilization, and impact of the victimization. If a respondent displays emotional distress, either verbally or non-verbally (i.e., crying) the interviewer will immediately offer to finish the interview at another time and will offer the respondent the telephone numbers for local, culturally competent, and financially accessible service providers and crisis networks, as well as the National Domestic Violence Hotline and The Rape, Abuse, and Incest National Network so that the respondent may obtain services to help alleviate their emotional distress. Similarly, in the unlikely event that a respondent expresses thoughts/intentions of suicide, the interviewer will stop the interview and will encourage the respondent to call the National Suicide Hotline.

In addition, the VAIW pilot study includes questions about general public safety issues (e.g., fear of crime and witnessing crime), attitudes toward law enforcement, and improving the criminal justice system. Health-related questions and demographic questions will be asked, including race, ethnicity, and tribal enrollment status. Scales used in the survey instrument have been drawn from several prior

studies, including the OMB-approved NISVS, the Indian Crime Victimization Survey (ICVS), the Copper River Women’s Experiences Survey (CRWES), the Campus Sexual Assault Survey (CSA), the British Crime Survey (BCS), and the Youth Risk Behavior Surveillance Survey (YRBSS). Depression and post-traumatic stress are measured using widely used and validated scales, the CES-D and the PC-PTSD. Per OMB guidelines, race and ethnicity items are structured to match NISVS and the U.S. Census.

The survey has undergone an initial round of cognitive testing with a total of eight AI&AN victims in Rapid City, South Dakota; Bethel, Alaska; Shiprock, New Mexico; and Albuquerque, New Mexico, and feedback from AI&AN women advocates and survivors of violence in each of these locations has been incorporated. The complete survey instrument and cognitive testing report are provided as Attachment B.

(iii) Identification of Website Content Directed at Children Under 13 Years of Age.

The VAIW pilot study does not involve web-based data collection methods nor does it refer respondents to websites.

A.2. Purpose and Use of Information Collection

The VAIW pilot study aims to:

1. Create and pilot test a survey instrument with women who [self-report as AI or AN who reside on recognized tribal lands in the U.S.](#) that captures valid, reliable data on the nature and extent of intimate partner violence, sexual violence, and stalking committed against AI&AN women; and
2. Develop and test a study methodology, including sampling strategy and data collection approach, that enables the safe collection of data, and analysis of results, which can then be generalized to AI&AN women, aged 18 or over, residing on tribal lands.

At the end of the pilot study, [NIJ will have considerably more knowledge, tools, experience, and methods to coordinate and field a larger study](#) as supported by the Violence Against Women Act of 2005, Public Law Number 109-162, Title IX, Section 904(a).

Developing an effective and resource-efficient survey instrument and methods is a critical first step toward documenting and addressing the problem of violence against American Indian and Alaska Native women.

Privacy Impact Assessment Information

No information in identifiable form (IIF) is being collected.

A.3. Use of Improved Information Technology and Burden Reduction

All interviews in pilot site #2 will be conducted in person, using a combination of Computer-Assisted Personal Interviewing (CAPI) and Audio Computer-Assisted Self-Interviewing (ACASI) technology. The use of CAPI will reduce respondent burden and coding errors for complex items, and increase efficiency and data quality. The CAPI program involves a computer-based sample management and reporting system that tracks the outcome of each interview attempt, documents sources of ineligibility, records the reasons for refusals, and locates mid-questionnaire termination. Cognitive testing in pilot site #3 will also be conducted in person, using computerized administration of selected portions of the CAPI/ACASI interview.

The CAPI system also includes the actual interview program (including the question text, response options, interviewer instructions, and interviewer probes). CAPI data quality and control program includes skip patterns, rotations, range checks, and other real-time consistency checks and procedures during the interview, ensuring that only relevant and applicable questions are asked of each respondent. Data collection and data entry occur simultaneously with the CAPI data entry system. The quality of the data is also improved because the CAPI system automatically detects errors and ensures there is no variation in the order in which questions are asked. Using existing statistical packages, data can be extracted and analyzed directly from the system, which significantly decreases the amount of time required to process, analyze, and report the data.

The use of ACASI technology for the portion of the interview that is deemed sensitive (including all questions about personal victimization, impact of victimization, and reporting) provides respondents with an additional layer of confidentiality. The question text appears on the screen and an audio version is transmitted via headphone, so sensitive questions are never read aloud by interviewers and interviewers do not know how respondents answered these questions. In a usability study of touchscreen ACASI with American Indian and Alaska Native respondents in which 39.6 percent of respondents had not used a computer in the past year, 96.0 percent reported they enjoyed using the computer, 97.2 percent reported the computer was easy to use, and 82.6 percent said they would prefer using computers for future surveys (Edwards, Slattery, Murtaugh, Edwards, Bryner, Pearson, Rogers, Edwards & Tom-Orme, 2007).

A.4. Efforts to Identify Duplication and Use of Similar Information

To help ensure that NIJ's research program builds upon prior research and does not duplicate it, NIJ commissioned a study of the relevant literature and extant research in the area of violence against American Indian and Alaska Native women: *Violence Against American Indian and Alaska Native Women and the Criminal Justice Response: What is Known* (Bachman, Zaykowski, Kallmyer, Poteyeva, and Lanier, 2008). The goals of this study were to examine what is known about the scope and consequences of violence against American Indian and Alaska Native women and factors that constrain or enhance effective justice systems' responses to this problem. The main findings of this study included:

- National rates of homicide victimization against American Indian and Alaska Native women are second to those of their African-American counterparts but higher than rates for Caucasian women. However, these national averages hide the very high rates of homicide of American Indian and Alaska Native women in some counties composed primarily of tribal lands.

- National annual incidence rates and lifetime prevalence rates for rape, other sexual assaults, and physical assaults are higher for American Indian and Alaska Native women compared to both African-American and Caucasian women.

However, crucial shortcomings in the existing research literature have not yet been addressed:

- 1) In the two existing population-based, nationally-representative studies collecting data on violence against women (the National Crime Victimization Survey [NCVS] and National Violence Against Women Survey [NVAWS]) the annual incidence of violence against AI&AN women cannot be estimated due to inadequate sample sizes.
- 2) Neither of these existing surveys nor the special study of AI&AN men and women conducted as part of NISVS in late 2010 include sufficient numbers of AI&AN women living on tribal reservations or in Alaska Native villages to generate the Indian Country estimates required by Congress.⁴
- 3) The only methodologically rigorous, cross-site, representative study of violence against American Indian women living on tribal reservation lands (Yuan et al, 2006) did not elicit information about lifetime prevalence nor annual incidence (instead using the reference period “Since you were 18”). In addition, findings from this same study (e.g., that the majority of respondents who reported a rape were raped by a male relative) underscore the fact that a complete picture of lifetime victimization cannot be obtained without asking adult respondents about victimization experiences they had as minors.

To prevent duplication of efforts, NIJ has involved a range of government agencies responsible for supporting public safety and public health for AI&AN women. Ongoing communication and partnership with these entities helps to ensure that the proposed pilot study and subsequent full-scale data collection do not duplicate any other existing or planned efforts. NIJ has consulted with the Centers for Disease Control and Prevention (CDC), Federal Bureau of Investigation (FBI), Bureau of Indian Affairs (BIA), Indian Health Service (IHS), Census Bureau, Executive Office for the United States Attorneys (EOUSA), Office of Justice Programs, Office of Tribal Justice, and Office on Violence Against Women. In addition, NIJ is collaborating with the State of Alaska and the Alaska Justice Center at the University of Alaska at Anchorage, which is undertaking a series of statewide and regional victimization surveys in close coordination with the VAIW pilot study.

⁴ Like the general population NISVS study, the AI&AN study was conducted via a random digit dial telephone survey of the noninstitutionalized U.S. population age 18 or older, with landline and cell phone numbers in telephone exchanges associated with at least 50 percent self-identified AI&AN population, in any of the 50 states and the District of Columbia. It is important to note that the NISVS AI&AN study differed from the general population sample. Respondents were screened into this special study at the front end if they identified themselves as an adult American Indian or Alaska Native person currently living in a private household. The adult respondent selected was the one with the most recent birthday. NIJ’s financial support enabled the addition of this separate sample of American Indian and Alaska Native respondents not specific to the VAWA Section 904a research mandate. Data from this additional study will not be presented in the initial NISVS report (expected late 2011) but will be described in future publications (2012).

NIJ also consulted with leading experts and advocates in the area of violence against AI&AN women to help plan and guide the development of the VAIW pilot study. In spring 2009, NIJ convened a two-day researchers' workshop to coordinate with and elicit feedback from the research community regarding NIJ's research program on violence against AI&AN women. NIJ brought together prominent researchers and experts in the areas of violence against women, AI&AN research and evaluation, conducting research in Indian Country, and public health and public safety issues in Indian Country. Participants discussed the scientific feasibility and practical considerations of NIJ's planned research effort and provided guidance, feedback, and recommendations (see Attachments C, D and E for researchers' workshop participants, agenda and recommendations, respectively).

In addition, a Violence Against Indian Women in Indian Country Task Force, established by the Attorney General on March 31, 2008, met a total of four times (see Attachment F for a list of task force members). Organizations and tribal governments represented on the task force appear in Section A8.

A.5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this study.

A.6. Consequences of Collecting the Information Less Frequently

This is a one-time data collection effort focused on piloting study instruments and methods.

A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The request fully complies with the regulation 5 CFR 1320.5.

A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A.8.a) Federal Register Notice

A 60-day Notice was published in the *Federal Register* on Tuesday, February 22, 2011 (Attachment G). One public comment was received on Tuesday, February 22, 2011 and is provided below.

“From: INFO PEWTRUSTS.ORG [<mailto:usacitizen1@live.com>]
Sent: Tuesday, February 22, 2011 2:08 PM
To: FN-OMB-OIRA-Submission; americanvoices@mail.house.gov;
president@whitehouse.gov
Cc: info@taxpayer.net; media@cagw.org; sf.nancy@mail.house.gov;
info@theteparty.org
Subject: public comment on federal register too much tax dollars spent collecting information but doing nothing about the issues - we need to refocus

FYI.

any act that only accounts for a study and no action to take based on what is found is a very stupid wasteful act. we have known for the last 60 years this is an issue. we dont need a survey to take action. use the tax dollars to help these women. jean public address if required”

A 30-day Notice was published in the *Federal Register* on April 29, 2011 and closed on May 31, 2011. No comments were received. (Attachment H).

A.8.b) Efforts to Consult Outside the Agency

Section 904 program activities and studies are guided by NIJ, OVW, and the Section 904 Violence Against Indian Women in Indian Country Task Force. The Task Force was commissioned under the authority of Section 904(a)(3) of the Violence Against Women Act of 2005, Pub. L. No. 109-162 (codified at 42 U.S.C. § 3796gg-10 note) and has been deemed a Federal Advisory Committee (5 U.S.C. App. 2).

The task force comprises representatives from:

- National tribal domestic violence and sexual assault nonprofit organizations.
- Tribal governments.
- National tribal organizations.

The task force is responsible for assisting NIJ and OVW in the development and implementation of this program of research. The task force was established by the Attorney General (AG) on March 31, 2008. Seventeen members were appointed and served until the first task force sunsetted on March 31, 2010 (see Attachment F for a list of names and affiliations). The representatives met a total of four times and provided input regarding the goals and design of the proposed data collection (see Attachment I for task force recommendations). On March 31, 2010, the AG approved the rechartering of the task force. OVW requested nominations for task force membership in the summer of 2010. Task Force member appointments were made official in September 2011. The first meeting

of the new task force is expected to convene December 14, 2011. The new task force comprised of fourteen representatives will continue to provide OVW and NIJ with assistance and guidance on the VAIW program of research.

The contractor, RTI International, obtained substantive input through consulting agreements with three of the leading researchers in the field.

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A.9. Explanation of Any Payment or Gift to Respondents

A wide variety of research has shown that incentives improve response rates and data representativeness (Armstrong, 1975; Yu and Cooper, 1983; Church, 1993; Singer, 2002; Cantor, O'Hare, and O'Connor, 2007). Incentives can help gain cooperation through fewer contact attempts, which can help make their use cost effective. Additionally, studies have shown that modest incentives are not coercive (Singer & Bossarte, 2006). Thus, implementing an incentive plan can be a cost effective way for surveys to improve response rates and lower refusal rates, and could, over the course of data collection, actually reduce costs and burden to respondents by reducing the need for additional calls to potential respondents. Increasing the response rate will also increase the likelihood that information provided by survey participants will be representative of the sample and will maximize the utility of all information provided by study participants.

We have based our proposed incentive amount on literature and protocols from other, similar studies (though with different populations). For example, the National Survey on Drug Use and Health (NSDUH), a cross-sectional field survey on a sensitive topic, began offering a \$30 post-paid incentive in 2002 (<http://oas.samhsa.gov/NSDUH/methods.pdf>). Prior to implementing this change, SAMSHA conducted an incentive experiment to test the impact of varied incentive amounts (\$0,

\$20, \$40) on response rates and survey costs. The \$40 group had the highest response rate (83.3%) followed by the \$20 group (78.8%). Further cost savings were seen for both the \$40 and \$20 incentive groups. Because most of their response rate gains came from the \$20 incentive group and the \$40 group had much greater variation in cost per interview compared to the \$20 group, NSDUH decided to offer a \$30 incentive (which balanced response rate increases and cost savings).

Comparison of the respondent conditions in self-administered versus interviewer-administered surveys suggests that the need for incentives will be greater in self-administered modes, where the persuasive presence of an interviewer is missing. In a meta-analysis that included face-to-face, telephone, and mixed-mode surveys, Singer et al. (1999) found that the effect of incentives was largely the same across modes.

We are unaware of any incentive experiments done with this particular population. We feel that studies of similar sensitivity, length, and mode provide sufficient information from which to extrapolate an incentive amount. We are concerned that an incentive experiment within one of the small, close-knit pilot communities would create mistrust and undermine the credibility of the larger study effort. Further, the small sample being interviewed in any given site would not allow firm conclusions to be drawn regarding such an experiment. Conducting an incentive experiment across pilot communities would be somewhat less likely to create mistrust but would make it difficult to determine whether resulting differences in response rates were attributable to incentive differences or other differences between the communities surveyed.

Interviewers will notify respondents of the incentive during the informed consent process. Interviewers will give incentives to respondents upon completion of the interview. The CAPI instrument will remind the Field Interviewer (FI) of the incentive payment at the end of the interview. The FI and the respondent will then sign a document to indicate that the incentive has been provided to the respondent.

In pilot site #2, respondents will be offered a \$35 incentive for completing the pilot interview, which is expected to take an average of 60 minutes. In pilot site #3, respondents will be offered a \$40 incentive for completing a 90-minute cognitive interview.

A.10. Assurance of Confidentiality Provided to Respondents

At no time will NIJ have access to or receive potentially identifiable information. During data collection, the study team will have names and addresses of all prospective respondents in the sampling frame in pilot site #2. This sampling frame information will be obtained via permission from the tribal government. At no time will this information be linked or linkable to survey information. Only limited demographic information will be requested in the survey (e.g., race, year of birth). Once the interview is completed, the respondent's locating information will be eliminated from the database in an overnight batch process.

Privacy Impact Assessment Information

A. This study is not subject to the Privacy Act.

To ensure that human subjects are adequately protected from unreasonable risks and properly informed of the potential harms and benefits from their participation in research, NIJ and recipients of its funds^[1] are required to comply with Department of Justice regulations at 28 CFR Part 46 (Protection of Human Subjects). These regulations, often referred to as the "Common Rule," generally require that projects using federal monies for research involving human subjects are reviewed and approved by an Institutional Review Board (IRB) prior to the expenditure of federal funds for that research.

Recipients of funding must submit a copy of the IRB's approval as well as supporting documentation concerning the IRB's institutional affiliation, necessary assurances, etc., to NIJ prior to the initiation of any research activities that are not exempt from the requirements of 28 CFR Part 46.

In addition, all recipients of NIJ funding must submit a Privacy Certificate as a condition of approval of a grant application or contract proposal regardless of whether the project involves the collection of identifiable data. In cases where no personally identifiable information will be collected, the Privacy Certificate should contain a statement to this effect and a brief project description.

The Privacy Certificate assures that the applicant understands his responsibilities to protect the confidentiality of research and statistical information and has developed specific procedures to ensure that this information is only used or revealed in accordance with the requirements of 42 USC §3789g and 28 CFR Part 22.

NIJ does not issue nor accept certificates of confidentiality issued by the National Institutes of Health or the U.S. Department of Health and Human Services. Recipients of funds must provide an assurance that they will protect identifiable information collected under NIJ/DOJ funding by submitting a properly completed privacy certificate (PC). Once the PC is approved by NIJ's human subjects' protection officer (HSPO), the identifiable data collected is then immune from legal process under the DOJ confidentiality statute (42 USC 3789g). Neither the PC nor the informed consent documentation should contain language about certificates of confidentiality. The PC and consents should accurately describe that the identifiable data collected is immune from process because the researcher submitted a PC; it was approved by NIJ and is thus covered by DOJ statute.

This submission has been reviewed by NIJ's Human Subjects Protection Officer, Cheri Crawford Watson, who determined that the Privacy Act does not apply; however, a Privacy Certificate is on file with NIJ. Respondents will be informed that the information they provide will be maintained in a secure manner and that data will be reported only in aggregate form.

B. How Information Will Be Secured

All data will be maintained in a secure manner throughout the data collection and data processing phases. Only RTI International personnel who are conducting the study and have a study-specific need to know will have access to the temporary information that could potentially be used to identify a respondent (i.e., the contact information), and all project staff will sign the RTI International Confidentiality Agreement (Attachment K). While under review, data will reside on directories that

only the project director can give permission to access. All computers reside in a building with electronic security and are ID and password protected.

No names will be collected in pilot site #1, and only respondents' first names will be used for the pilot and cognitive interviews in pilot sites #2 and #3, respectively. The word "first name" is used to send the advanced informational letter prior to the interview in pilot site #2. To maximize human subject protection, the letter provides only general information about the survey (see Attachment L). The lack of detailed study information in the advance letter is intentional for the protection of the prospective study participant. If the prospective study participant is in a relationship where abuse or violence is present, project staff does not want the advance letter to raise suspicion or incite potential perpetrators.

RTI International has procedures in place to protect against data loss and down time in the event of equipment failure. These include regularly scheduled back up of data, redundant services in case of server failure, and uninterruptible power supplies to bridge a temporary loss of power. Under normal operating conditions, a complete backup of all files on every disk will be written to tape weekly. Every business day, a differential backup will be performed for all files created or modified since the last complete backup. In the event of a hardware or software failure, files can be restored to their status as of the time of the last differential backup, usually the evening of the previous business day. Tapes from complete backups will be kept for approximately three months. Tapes or CD-Rs are used for long-term data archiving.

Several additional measures will be implemented to ensure data security. The address files used to send the letters of introduction will be destroyed as soon as the letters are delivered. The CAPI/ACASI system will include a compartmentalized data structure, in which personally identifying information are maintained separately from the actual questionnaire responses. Once an individual has completed her survey, all identifying information including first name and contact information will be stripped from the data files and destroyed in an overnight batch process. These measures safeguard the privacy of participants – once their interview has been completed, it will not have any personal identifiers.

Before any data are released (e.g., in disseminated reports), all demographic information that could potentially lead to identification of an individual will be stripped and the information will be destroyed. The database is configured so that it is not possible to retrieve individual responses or potentially identifying information.

C. Procedures for Obtaining Informed Consent

A written informed consent is obtained prior to the conduct of the pilot and cognitive interviews (Attachment M). Potential respondents are informed: 1) of the purpose for the data collection; 2) that their data will be treated in a secure manner and will not be disclosed; and 3) that all information collected will be pooled with responses from other participants. Following recommended guidelines (Sullivan & Cain, 2004; Watts, Heise, Ellsberg, & Moreno, 2001) a graduated informed consent protocol will be used. For research on topics such as intimate partner violence (IPV) and other forms of violence against women, a graduated consent process is often most appropriate. Literature regarding the ethical and safe collection of research data on IPV offers many reasons for obtaining

informed consent in a graduated manner (Council for International Organization of Medical Sciences, 1993; Sullivan & Cain, 2004). In addition to safety and ethical considerations, a graduated consent process allows the interviewer to build rapport and increases the likelihood of gaining the participant's trust, the key to minimizing non-participation and under-reporting. Carefully conducted studies with well-trained interviewers who are able to build rapport and trust with potential participants are essential both to the collection of valid data and the well-being of respondents.

D. Informing Respondents of the Voluntary Nature of Survey Participation

During the informed consent process undertaken in pilot sites #2 and #3 for pilot and cognitive testing, respondents are informed that their participation is completely voluntary. They are also explicitly informed that they can skip any question that they do not want to answer. The informed consent form approved by RTI's Institutional Review Board for use with this pilot study is found in Attachment M.

A.11. Justification for Sensitive Questions

Very few women report violent victimization (including IPV, sexual violence, or stalking) to officials and very few injuries are reported to health care providers. Thus, survey data remain the best source of information regarding the incidence and prevalence of violence against women.

Until recently, questions about IPV, sexual violence, and stalking were considered by some to be “too sensitive” to ask. CDC recently evaluated respondent reactions to questions about violence in three large telephone surveys. In all three surveys, it was consistently found that between 88.0 percent and 98.4 percent of participants felt such questions should be asked, regardless of their experience with or their history of interpersonal violence (Black, Kresnow, Simon, Arias and Shelley, 2006). Victims were as likely as non-victims to believe that such questions should be asked. In addition, responses were consistent, regardless of the respondent's victimization experience; those with different types of victimizations, those victimized within the past 12 months, and those never victimized by an intimate partner all reported that the questions should be asked. Importantly, even among victims who reported that being asked these questions made them feel upset or afraid, the majority felt that such questions should be asked (Black, Kresnow, Simon, Arias and Shelley, 2006). These results suggest that commonly held beliefs and assumptions regarding participants' reactions to questions about interpersonal violence may be unfounded. Given that issues related to confidentiality, safety, and providing resources are adequately addressed, these findings provide important information for researchers and offer some assurance to those concerned with the ethical collection of data on victimization (Black and Black, 2007).

Attachment B contains the VAIW pilot study survey instrument. All questions about violent victimization that are included in the VAIW pilot study survey (including IPV, sexual violence and stalking) were used in the NISVS instrument, and follow-up questions about the impact and reporting of victimization are modeled on those included in the NISVS. Additional information regarding the potential benefits of participating in a survey that includes questions of this sensitive nature were gathered in the NISVS pilot, which was conducted in early 2007 (OMB # 0920-0724). More than 70 percent of respondents reported that they gained something positive from participating (Carley-Baxter, Lynberg & Twiddy, 2007). Nearly 70 percent reported that they felt someone cared about issues that were important to them and over 90 percent reported the perceived benefit of

helping others (Carley-Baxter, Lynberg & Twiddy, 2007). When researchers focus solely on the potential for negative impact, such perceived positive responses to participation by respondents may be overlooked.

Still, it is critical that respondent safety remains the primary concern for any data collection asking about violence, particularly IPV, sexual violence, and stalking. Such measures have been well described (Sullivan & Cain, 2004) and are addressed in the interviewer training.

A.12. Estimates of Annualized Burden Hours and Costs

A.12.a) Number of respondents, frequency of response, and annual hour burden

The burden associated with this one-time data collection is documented in Table 1, including the number of respondents and annual hour burden. The survey instrument will require an average of 60 minutes to complete for pilot interview respondents at pilot site #2, whereas cognitive testing will require an average of 90 minutes per respondent at pilot site #3.

Table 1. Estimated Annual Respondent Burden for VAIW Pilot study

Respondent Location	Number of Responses	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Burden (in hours)
Site #1	N/A	N/A	N/A	0
Site #2	35	1	1	35
Site #3	20	1	1.5	30
Total				0hours

Note that this estimated annual burden of 65 hours represents the entire burden associated with this pilot, as this is not a multi-year data collection.

A.12.b) Annual cost to respondents

Table 2. Estimated Annual Cost to Respondents

Respondent Location	Number of Responses	Number of Responses per Respondent	Average Burden per Response (in hours)	Average Hourly Wage Rate (in dollars)	Cost
Site #1	N/A	N/A	N/A	\$15.92	\$0
Site #2	35	1	1	\$15.92	\$557.20
Site #3	20	1	1.5	\$15.92	\$477.60
Total					\$0

Note that this estimated annual cost of \$1,035 represents the entire cost associated with this pilot, as this is not a multi-year data collection.

The estimates of individual annualized costs are based on the amount of time required from individuals who complete an in-person interview and the average hourly wage obtained from the 2005 U.S. Bureau of Labor Statistics. For those who agree to participate in pilot interviews (site #2), it is estimated that the total time required will be approximately 60 minutes, on average, including screening and informed consent. For those who agree to participate in cognitive interviews (site #3), it is estimated that the total time required will be approximately 90 minutes, on average, including informed consent. The average hourly earnings for those in private, non-farm positions are \$15.92 (<http://www.dol.gov/dol/topic/statistics/index.htm>). Thus, the burden for each individual who is eligible and chooses to participate in the pilot survey in site #2 is \$15.92, whereas for cognitive interview participants (in site #3) the burden is \$23.88.

A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

This data collection activity does not include any other annual cost burden to respondents, nor to any record keepers. No capital or startup costs will be incurred.

A.14. Annualized Cost to the Government

The contract to develop and conduct the pilot survey was competitively awarded to RTI International. The total firm-fixed contract cost is based on a total 18-month contract amount of \$599,922; however, a total of 12 months of no cost extension have been awarded, making this a 30-month contract. The annualized cost in Table 3 represents the total contract cost annualized over the extended (30-month) study period.

Costs for this study include personnel for designing the study, developing, programming, and testing the survey instrument; drawing the sample; training the recruiters/interviewers; collecting and analyzing the data; and reporting the study results.

Table 3. Estimated Annualized Cost to the Government

Type of Cost	Description of Services	Annual Cost
Contracted Personnel and Services	Study design <ul style="list-style-type: none"> • Site selection guidance • Sampling strategy Instrumentation <ul style="list-style-type: none"> • Draft instrument content • Final instrument content • Programmed CAPI/ACASI instrument Data collection <ul style="list-style-type: none"> • Interviewer hiring training and monitoring • Data collection and analysis 	\$ 239,968.80
Total Annual Estimated Costs		\$ 239,968.80

There are no direct costs to the National Institute of Justice (i.e., salary, fringe, overhead or travel). This is a firm-fixed priced contract competitively awarded to RTI to cover all study costs. NIJ staff direct study activities as part of their normal workloads.

A.15. Explanation for Program Changes or Adjustments

This is a new data collection.

A.16. Plans for Tabulation and Publication, and Project Time Schedule

Table 4. Project Time Schedule

<i>Milestone</i>	<i>Timeframe</i>
Recruit Interviewers	one week after OMB approval
Train Interviewers	four weeks after OMB approval
Complete Pilot Data Collection	two months after OMB approval
Finalize Procedure Guide	three months after OMB approval
Finalize Study Manual	three months after OMB approval
Finalize Data Dictionary, Codebook & Analyst’s Guide	three months after OMB approval
Finalize Data Repository Plan	four months after OMB approval
Finalize Dissemination Plan	five months after OMB approval
Submit Final Progress Report	six months after OMB approval

Findings from the pilot study are not intended for reporting; rather, lessons learned from fielding the pilot study will be used to inform instrumentation and methods for future research efforts in Indian Country.

Due to the purpose of the pilot study and the small sample size, data from the pilot study will not be used to generate reportable estimates of the prevalence of violence against American Indian and Alaska Native women in Indian Country. Similarly, victims’ service needs, reporting experiences, and the impact of victimization will not be reported due to small sample. Basic descriptive statistics (e.g., frequency, mean, median) will be generated to describe study participant characteristics. Descriptive statistics may also be used to describe respondents’ perceptions of community public safety, attitudes toward law enforcement, and opinions about improving law enforcement responses.

Lessons learned from this pilot study (e.g., instrumentation, methods) will be reported to the VAIW Task Force, federal partners, USDOJ Tribal Consultations, and at academic venues (e.g., American Society of Criminology and American Evaluation Association Annual Meeting). A final progress report for the pilot study and other final study deliverables (Table 4) will incorporate this information as well. NIJ will convene a second AI&AN research experts workshop in 2012 to report pilot study findings and elicit further feedback from the scientific community regarding the program’s methodology.

A.17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.