

Supporting Statement for Paperwork Reduction Act Submission

Annual Progress Report for STOP Violence Against Women Formula Grant Program

A. Justification

1. Statutorily-Mandated Need for Information

The primary goal of the STOP (Services*Training*Officers*Prosecutors) Violence Against Women Formula Grant Program (STOP Formula Grant Program) is to develop and strengthen the criminal justice system's response to violence against women and to support and enhance services for victims. The STOP Formula Grant Program was authorized through the Violence Against Women Act (VAWA) of 1994 and reauthorized and amended by the VAWA of 2000 and by the VAWA of 2005. The Department of Justice's Office on Violence Against Women (OVW) administers the STOP Formula Grant Program according to a statutory formula. All states, including the U.S. territories and the District of Columbia, are eligible to apply for STOP Program grants to address the crimes of sexual assault, domestic violence, dating violence, and stalking. Funds are distributed to the states according to the following formula: a base award of \$600,000 is made to each state, and remaining funds [are awarded] to each state in an amount that bears the same ratio to the amount of remaining funds as the population of the state bears to the population of all of the states that results from a distribution among the states on the basis of each state's population in relation to the population of all states (not including populations of Indian tribes (42 U.S.C. section 3796gg-1(b)(5) and (6)). Grant awards are made to state governments and administered through a STOP State Administrator. Funds granted to the states are then sub granted to agencies and programs, including state offices and agencies, state and local courts, units of local government, tribal governments, and nonprofit, nongovernmental victim services programs. VAWA requires each state to distribute STOP Program funds as follows: 25 percent for law enforcement; 25 percent for prosecution; 30 percent for victim services, of which at least 10 percent shall be distributed to culturally specific community-based organizations; and 5 percent for state and local courts, including juvenile courts. The use of the remaining 15 percent is discretionary, within parameters defined by statute.

Currently, there are different statutory and regulatory reporting requirements that affect recipients of federal funds under the STOP Formula Grant Program. First, VAWA 2000 requires all VAWA grantees, including STOP State Administrators and subgrantees, to report on the effectiveness of their programs to the Attorney General who, in turn, must report to Congress every two years. Section 1003 of VAWA 2000 states that:

(a) REPORT BY GRANT RECIPIENTS.- The Attorney General or Secretary of Health and Human Services, as applicable, shall require grantees under any program authorized or reauthorized by this division or an amendment made by this division to report on the effectiveness of the activities carried out with amounts made available to carry out that program, including number of persons

served, if applicable, numbers of persons seeking services who could not be served and such other information as the Attorney General or Secretary may prescribe.

(b) REPORT TO CONGRESS.- The Attorney General or Secretary of Health and Human Services, as applicable, shall report biennially to the Committees on the Judiciary of the House of Representatives and the Senate on the grant programs described in subsection (a), including the information contained in any report under that subsection.

42 U.S.C. ' 3789.

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

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

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

The Department of Justice regulations provide that states and local and Indian tribal governments receiving federal grants must submit periodic performance reports that include a comparison of actual accomplishments to the objectives established and the reasons for slippage if the objectives were not met. 28 CFR 66.40¹

OVW must also comply with the Government Performance and Results Act of 1993 (GPRA) (Pub. L. 103-62) which was enacted to increase Congressional and Administrative focus on the results from government programs and activities. Information collected on the semi-annual progress report regarding performance measures, including output measures, that OVW has developed for the different types of STOP Formula Grant Program subgrantees will enable OVW to meet its reporting obligations under GPRA.

2. Use of Information

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

OVW uses data from the information collection² in different ways. OVW uses the information collected from STOP State Administrators and subgrantees to monitor their grant-funded activities and qualitatively assess those activities. STOP State Administrators provide information on STOP Program funds awarded to subgrantees, statutory allocation categories, use of discretionary funds, use of administrative funds, culturally specific victim services awards, percentage of allocations by type of victimization, and active subgrants. Narrative questions provide an opportunity for more detailed qualitative information on the status of the STOP implementation plan, efforts to recognize and address the needs of underserved populations and culturally specific victim services and the significant areas of remaining need with regard to increasing victim/survivor safety and offender accountability. OVW reviews each annual progress report to monitor the performance of individual STOP State Administrators and ensure that the goals and objectives set forth in applications for funding and award documents are met.

The subgrantees collect information that addresses the following grant-funded activities (different sections on the reporting form): staff, statutory purpose areas, training, community coordinated responses, policies, products, data collection and communication systems, specialized units, system improvement, victim services, protection orders, and the criminal justice system (law enforcement, prosecution, courts and probation). Narrative questions at the end of these different sections enable subgrantees to give more detailed qualitative information about their grant-funded activities. In addition, subgrantees must answer narrative questions on the most significant areas of remaining need with regard to improving services to victims/survivors of sexual assault, domestic violence dating violence and stalking, increasing victim/survivor safety, and enhancing community response (including offender accountability for both batterers and sex offenders) and what STOP funding has allowed the subgrantee to do that it could not do prior to receiving the funding.

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of STOP State Administrators and subgrantees. These may 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.

OVW aggregates data from all STOP subgrantee progress reports to assess the performance of the STOP Formula Grant Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how STOP Formula Grant Program funds are being used. In addition, information collected from STOP subgrantees will support the following OVW GPRA measures:

² 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.

Number of victims receiving requested services;
Number of advocates funded;
Number of protection orders issued;
Number of policies developed/revised;
Number of victims requesting services who received them;
Number of grant funded multi-disciplinary training events that have occurred; and
Number of professionals trained to respond to domestic violence, dating violence, sexual assault, and stalking.

Information collected from STOP State Administrators and subgrantees will enable OVW to respond to statutory requirements to report on the number of grants made and funds distributed under the STOP Formula Grant Program grants; a summary of the purposes for which those grants were provided and an assessment of their progress; and a statistical summary of persons served, detailing the nature of victimization, and providing data on age, sex, relationship of victim to offender, geographic distribution, race, ethnicity, language, and disability. The structure of the Congressional report on the STOP Formula Grant Program (cited in the previous section) includes a “Background” section that sets out the statutory origins and outlines of the STOP Program – the goals, the allocation and distribution of STOP Formula Program funds, and states’ eligibility, and reporting methods. Another section describes the sources of the data and how funds were used during a specific calendar year– what types of agencies and organizations received funding and the types of activities they engaged in. Another section entitled “Effectiveness of the STOP Programs” describes key activities supported with STOP Formula Grant Program funds, discusses why they are important, and provides examples of specific STOP-funded programs and initiatives engaging in those activities.³ The Report also contains aggregated data reported by subgrantees presented in greater detail with regard to activities engaged in with STOP Program funds. Appendix A and Appendix B present data on the numbers and amounts of awards in the mandated allocation categories (i.e., victim services, law enforcement, prosecution, and courts) and the number and characteristics of victims/survivors served on a state-by-state basis.

The data that OVW collects on the annual subgrantee progress reporting forms is currently not used in connection with a evaluation of the STOP Formula grant program. OVW is currently exploring the development of a multi-layered evaluation agenda in order to meet the statutory requirement to report on an evaluation of the effectiveness of programs funded.

3. Use of Information Technology

³ Much of the data collected helps OVW monitor the grants to ensure that STOP funds are being used for the purposes authorized by law and provides important information about the quantity of authorized activities (e.g., number of trainings, number of victims served, etc.) produced by the funds. OVW primarily relies on two sources of information to make sure that our grantees are effective. First, OVW collects data from grantees about what they do with VAWA funding; second, to support our assessment, the body of existing research evaluating responses to violence against women is examined.

The collection of information will involve the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology. STOP State Administrators are required to submit annual progress reports through the Grants Management System (GMS) and subgrantees report directly to the STOP State Administrators.

4. Duplication of Information Request

There is no other mechanism by which OVW collects information about grant funded activities, including number of victims served or victims seeking services who could not be served or persons trained.

5. Impact on Small Entities

There is no impact on small entities as the collection of this type of information is routinely kept by STOP State Administrators and most subgrantees receiving funds under the STOP Formula Grant Program

6. Consequences to Federal Programs or Policy

Through VAWA, Congress has mandated that the recipients of funds under the STOP Formula Grant Program report to OVW on the effectiveness of grant-funded activities. In addition, through VAWA 2000, Congress mandated that all OVW 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 certain provisions of statutorily required reporting mandates, but also the existence of this important and necessary formula grant program could be jeopardized. The STOP Formula Grant Program supports important programs that provide critical training to address violence against women, provide victims services, and support coordinated community responses to such crimes. The STOP Formula Grant Program promotes a coordinated, multi-disciplinary approach to improving the criminal justice system's response to violence against women and supports partnerships among law enforcement, prosecution, courts, and victim advocacy organizations to enhance victim safety and to increase offender accountability.

7. Special Circumstances

There are no special circumstances as identified in the specific instructions for a supporting statement for Paperwork Reduction Act Submissions.

8. Federal Register Publication

OVW has consulted with persons outside the agency who have advised that the data proposed to be collected is available, the annual collection of such data is not burdensome, the

form is clear, and that the information is routinely kept by most STOP State Administrators and subgrantees receiving funds under the STOP Formula Grant 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 November 7, 2011 (Federal Register, Volume 76, page 68786) and a 30-day notice was published in the Federal Register on January 10, 2012 (Federal Register, Volume 77, page 1507).

9. Payment or Gift to Respondents

There will no payment or gift to respondents.

10. Confidentiality

Although this information is needed for a public report to Congress, it will not involve any personal information about victims that could identify them as specific individuals. However, anecdotal, non-identifying information about the effectiveness of individual programs may be included in the report. There is no assurance to confidentiality.

11. Specific Questions

The annual progress reporting form will not contain any questions of a personal, sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Hour Burden of the Collection of Information

This annual progress reporting form is not overly burdensome. The data collection tool will be completed by 56 STOP State Administrators (from 50 states, the District of Columbia and five territories and commonwealths (Guam, Puerto Rico, American Samoa, Virgin Islands, Northern Mariana Islands) and their approximately 2500 subgrantees⁴. There will be 2,556 annual responses and it is estimated that it will take State STOP Administrators and subgrantees no more than 1 hour to complete the semi-annual progress report form. Thus, the annual reporting and recordkeeping hour burden is 2,556. State STOP Administrators are informed about the reporting requirements during the grant solicitation process and during the grant 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.

14. Annualized Costs to the Federal Government

⁴ Each year the number of STOP subgrantees changes. The number 2,500 is based on the number of reports that OVW has received in the past from STOP subgrantees.

The annualized costs to the Federal Government resulting from the OVW staff review of the progress reports submitted by grantees are estimated to be \$143,136.

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 STOP State Administrators (including subgrantees) to comply with the statutory reporting requirements and Government Performance and Results Act of 1993 (Pub. L. 103-62).

16. Published Results of Information Collections

There will be no complex analytical techniques used in connection with the publication of information collected under the request. Information will be gathered once a year at the end of the calendar year. OVW is statutorily required to submit a report on -grant-funded activities under the STOP Formula grant program on a biennial basis as discussed in paragraphs 1 and 2. These reports are delivered to Congress and made public on the OVW website. In addition, OVW publishes data reports that aggregate information from all STOP subgrantees. These Summary Data Reports reflect aggregate information provided by STOP subgrantees and include the number of grant-funded staff, the number of people trained, and the number of victims/survivors seeking services that are served, partially served, and not served. Demographic data on the victims/survivors served, the types of services provided, and criminal justice activities data are also included in the Summary Data Reports.

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 Progress Reporting Form.

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.