

## Supporting Statement for Paperwork Reduction Act Submission

### Semi-Annual Progress Report for the Tribal Sexual Assault Services Program – Grants

#### A. Justification

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

The Tribal Sexual Assault Services Program (SASP Tribal Program), part of the Sexual Assault Services Program (SASP) was created by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA 2005), 42 U.S.C. §14043g, and is the first Federal funding stream solely dedicated to the provision of direct intervention and related assistance for Tribes to address victims of sexual assault. The SASP encompasses four different funding streams for States and Territories, tribes, state sexual assault coalitions, tribal sexual assault coalitions, and culturally specific organizations. Overall, the purpose of SASP is to provide intervention, advocacy, accompaniment (e.g., accompanying victims to court, medical facilities, police departments, etc.), support services, and related assistance for adult, youth, and child victims of sexual assault, family and household members of victims, and those collaterally affected by the sexual assault.

Survivors of sexual assault from culturally specific communities frequently confront unique challenges when seeking assistance, such as linguistic and cultural barriers. Sexual assault advocates report that survivors are more inclined to seek services from organizations that are familiar with their culture, language, and background and that there is no “one size fits all” solution to adequately address these critical needs. Tribes and tribal organizations are more likely to understand the complex, multi-layered challenges and obstacles that victims from their communities face when attempting to access services in response to the sexual assault.

In order to provide the most appropriate services to tribal victims, the SASP Tribal Program targets nonprofit organizations that focus primarily on tribes and tribal organizations that have experience in the area of sexual assault or who partner with an organization having such expertise. The goal of the SASP Tribal Program is to create, maintain, and expand sustainable sexual assault services provided by tribal organizations, which are uniquely situated to respond to the needs of tribal sexual assault victims.

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

## 2. Use of Information

OVW uses data from the information collection<sup>1</sup> in different ways. OVW will use the information collected from SASP Tribal Program grantees to monitor their grant-funded activities and qualitatively assess those activities. In particular, OVW is seeking data that includes baseline information to review activities supported with SASP Tribal Program funds, including, for example, an increase in the number of trainings or an increase in the number of victims served. OVW will review each semi-annual progress report to monitor individual grantee's performance, including the grant-funded activities and to ensure that the goals and objectives set forth in applications for funding and award documents are met.

The SASP Tribal Program grantees collect information that addresses the following grant-funded activities (different sections on the reporting form): staff, statutory purpose areas, informational materials, and victim services. Narrative questions at the end of these different

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<sup>1</sup> 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.

sections enable grantees to give more detailed qualitative information about their grant-funded activities. In addition, grantees must answer narrative questions on the most significant areas of remaining need with regard to improving services to victims/survivors of sexual assault, increasing victims/survivors safety, and enhancing community response (including offender accountability or sex offenders), what has federal funding allowed the grantee to do that grantee could not do prior to receiving funding, additional information about the SASP Tribal Program grant and/or the effectiveness of the grant and any additional information about the data submitted.

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of SASP Tribal Program grantees. 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 will aggregate data from all grantees progress reports to assess the performance of the SASP Tribal Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how SASP Tribal Program funds are being used. In addition, information collected from grantees will support the following OVW GPRA measures:

Number of victims receiving requested services;  
Percentage of victims requesting services who received them;  
Number of policies developed/revised; and  
Number of communities with improved CCR.

Information collected from SASP Tribal Program grantees will enable OVW to respond to statutory requirements to report on the effectiveness of grant-funded activities. OVW has submitted the 2012 Measuring Effectiveness Report to Congress, which includes information about how funds were expended and an assessment of the effectiveness of funded programs. This report is based on data submitted by grantees reflecting SASP Tribal Program awards made and SASP Tribal Program-funded activities engaged in during calendar years 2010 and 2011.

The data that OVW collects on the semi-annual progress reporting forms is currently not used in connection with an evaluation of the SASP Tribal Program. OVW is currently exploring the development of a multi-layered evaluation agenda for its grant programs.

It is important that OVW collect this information from SASP Tribal Program providers on a semi-annual basis so that OVW can ensure that they are performing within the statutory limitations of the program in a timely manner. Because OVW is not able to perform site visits with every SASP Tribal Program grantee, the review of progress reports every six months enables OVW to monitor grantees in timely manner. It is easier to identify a potential resolution for a matter that needs correction or modification if the issue is identified sooner rather than later. An annual report would increase the potential for grantees, unintentionally or intentionally, to spend grant funds inappropriately for a longer period of time. Semi-annual reporting periods

allow for more frequent coarse corrections and interaction between the grantee and OVW. In addition, having a six month reporting period enables OVW to determine whether SASP Tribal Program grantees have successfully completed requisite activities necessary to advance to the next phase of implementation, i.e. completing planning meetings or instituting a coordinated community response by completing memoranda of understanding.

### 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. OVW grantees are required to submit semi-annual progress reports through the Grants Management System (GMS).

### 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 Entities

There is no impact on small entities as the collection of this type of information is routinely kept by most grantees receiving funds under the SASP Tribal Grant Program.

### 6. Consequences to Federal Programs or Policy

Through the VAWA 2000, Congress has mandated that SASP Tribal Grant Program grantees report to the Attorney General on the effectiveness of their activities funded under VAWA. 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.

### 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 semi-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 SASP Tribal 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 July 22, 2013 (Federal Register, Volume 78, page 43918) and a 30-day notice was published in the Federal Register on September 24, 2013 (Federal Register, Volume 78, page 58557). OVW did not receive any public comments.

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 15 SASP Tribal Grant Program grantees twice a year. There will be 30 semi-annual responses and it is estimated that it will take grantees no more than 1 hour to complete the progress report form. Thus, the semi-annual reporting and recordkeeping hour burden is 30 hours. SASP Tribal Grant Program grantees are informed about the reporting requirements during the grant solicitation process and during the grant award process.

OVW is seeking basic information that is routinely kept by the grantees in the normal course of their operations. Thus, the requirement that grantees complete this 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 SASP Tribal Grant Program and that the grantees have been apprized of these reporting requirements during the solicitation process and reminded throughout the grant award process. The 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 semi-annual cost burden on respondents or recordkeepers resulting from the collection of this information.

14. Annualized Costs to the Federal Government

The annualized costs to the Federal Government resulting from the OVW staff review of the progress reports submitted by grantees are estimated to be \$1680.

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 SASP Tribal Grant 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 once a year at the end of the reporting periods. 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 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.