

## **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, by the VAWA of 2005 and by the VAWA of 2013. Grant awards are made to state governments and administered through a STOP State Administrator. Each state and territory must allocate OVW grant funds to law enforcement, prosecution, courts, and victim services within the statutory parameters. Eligible applicants for the STOP Formula Grant Program include any state within the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands.

Currently, there are different statutory and regulatory reporting requirements that affect recipient 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, as required by the Violence Against Women Act, the Attorney General shall submit to the Committee on the Judiciary of the House of Representatives and the Committee on the Judiciary of the Senate a biennial report on the STOP Formula Grant Program that includes (1) the number of grants made and funds distributed; (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 the membership of persons served in any underserved population; and (4) an evaluation of the effectiveness of programs funded. 42 U.S.C. § 3796gg-3

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 66.40<sup>1</sup>

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 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

OVW uses data from the information collection<sup>2</sup> in different ways. OVW will review each annual progress report to ensure statutory compliance and to ensure that the goals and objectives set forth in applications for funding and award documents are met.

The STOP Formula Grant Program subgrantees 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 sections enable subgrantees to give more detailed qualitative information about

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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).

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.

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, 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 STOP Formula Grant program subgrant and/or the effectiveness of the subgrant 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 review the activities of the STOP state administrators and of subgrantees. These may include OVW staff attendance at site visits, grant-funded training and technical assistance events, and ongoing consultation with OVW staff.

OVW will aggregate data from all subgrantees 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 these funds are being used. In addition, information collected from grantees will support the following OVW GPRA measures:

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 effectiveness of grant-funded activities. OVW has submitted the 2012 Biennial Report to Congress on the STOP Grant program, 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 STOP awards made and STOP-funded activities during the calendar year 2008.

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

### 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 annual progress reports through the Grants Management System

(GMS).

4. Duplication of Information Request

There is no other mechanism by which OVW collects this information about grant funded activities including 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 subgrantees receiving funds under the STOP Formula Grant Program.

6. Consequences to Federal Programs or Policy

Through the VAWA, Congress has mandated that STOP administrators and subgrantees 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 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 State STOP 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, 2013 (Federal Register, Volume 78, page 66953) and a 30-day notice was published in the Federal Register on January 14, 2014 (Federal Register, Volume 79, page 2474). 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 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

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 subgrantees<sup>3</sup>. 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 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.

OVW is seeking basic information that is routinely kept by the subgrantees 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 subgrantee to complete the form. OVW developed this estimate based on the fact that information of this nature is already kept by subgrantees receiving funds under the STOP Formula Grant Program and that the subgrantees have been apprized of these reporting requirements. The progress report is divided into sections that pertain to the different types of activities that subgrantees 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

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<sup>3</sup> 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.

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

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 its STOP state administrators and STOP Formula Grant Program subgrantees to comply with the statutory reporting requirements of VAWA 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.