

## Supporting Statement for Paperwork Reduction Act Submission

### Semi-annual Progress Report for the Safe Havens: Supervised Visitation and Safe Exchange Grant Program

#### A. Justification

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

The Safe Havens: Supervised Visitation and Safe Exchange Grant Program (Safe Havens Program) was originally authorized through the Violence Against Women Act (VAWA) of 2000. The Safe Havens Program provides an opportunity for communities to support the supervised visitation and safe exchange of children in situations involving domestic violence, dating violence, child abuse, sexual assault, or stalking. Studies have shown that the risk of violence is often greater for victims of domestic violence and their children after separation from an abusive situation. Even after separation, batterers often use visitation and exchange of children as an opportunity to inflict additional emotional, physical, and/or psychological abuse on victims and their children. Visitation and exchange services provided through the Safe Havens Program should reflect a clear understanding of the dynamics of domestic violence, dating violence, sexual assault and stalking; the impact of domestic violence on children; and the importance of holding offenders accountable for their actions.

VAWA requires the Attorney General on a biennial basis to report to Congress on the number of individuals served and the number of individuals turned away from visitation programs and services and safe visitation exchange; the number of individuals from underserved populations served and turned away from services; the type of problems that underlie the need for supervised visitation or safe visitation exchange, such as domestic violence, child abuse, sexual assault, other physical abuse, or a combination of such factors; the numbers of supervised visitations or safe visitation exchanges during custody determinations under a separation or divorce decree or protection order, through child protection services or other social services agencies, or by any other order of a civil, criminal, juvenile, or family court; the process by which children or abused partners are protected during visitations, temporary custody transfers, and other activities for which supervised visitation is established under this section; safety and security problems occurring during the reporting period during supervised visitation under this section, including the number of parental abduction cases; and the number of parental abduction cases in a judicial district using supervised visitation programs and services under this section, both as identified in criminal prosecution and custody violations.

Again, under VAWA 2000, all grant recipients are statutorily required to report on the effectiveness of their programs, and the Attorney General must report to Congress on the effectiveness of each project. 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 to VAWA, other statutory requirements require that Safe Havens Program grantees collect and maintain data that measures the effectiveness of the grant-funded projects. 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 Safe Havens grantees will enable OVW to meet its reporting obligations under GPRA.

## 2. Use of Information

OVW uses data from the information collection<sup>1</sup> in different ways. OVW will use the information collected from Safe Havens 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 Safe Havens Program funds, including, for example, an increase in the number of trainings or products developed. OVW will review each semi-annual progress report to monitor an 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.

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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.

The Safe Havens Program grantees collect information that addresses the following grant-funded activities (different sections on the reporting form): staff, products, services for families, and trainings. Narrative questions at the end of these different 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, what has federal funding allowed the grantee to do that grantee could not do prior to receiving funding, additional information about the Safe Havens 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 grantees. These may include OVW staff attendance at 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 Safe Havens Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how Safe Havens Program funds are being used. In addition, information collected from grantees will support the following OVW GPRA measures:

Number of policies developed/revised;  
Number of communities with improved CCR;  
The 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 Safe Havens 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 Safe Havens Program awards made and the TA Program-funded activities engaged in during calendar years 2009 and 2011.

The data that OVW collects on the semiannual progress reporting forms is currently not used in connection with an evaluation of the Safe Havens 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 Safe Havens Program grantees on a semi-annual basis so that OVW can ensure that program goals are being met and funds are supporting statutorily permissible activities. Because OVW is not able to perform site visits with every Safe Havens 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. In addition, having a six month reporting period enables OVW to determine whether Safe Havens 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 including numbers of families served, number of 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 Safe Havens Program.

6. Consequences to Federal Programs or Policy

By statute, Congress has mandated that Safe Havens 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 the ability to collect information about these important and necessary grant-funded services could be jeopardized. The Safe Havens Program provides an opportunity for communities to support the supervised visitation and safe exchange of children, by and between parents, in situations involving domestic violence, child abuse, sexual assault, or stalking.

7. Special Circumstance

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 Safe Havens 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 June 30, 2014 (Federal Register, Volume 79, page 36820) and a 30-day was

notice was published in the Federal Register on August 29, 2014 (Federal Register, Volume 79, page 51611). 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 33 Safe Havens Program grantees twice a year. There will be 66 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 annual reporting and recordkeeping hour burden is 66 hours. Safe Havens 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 Safe Havens 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, services. Grantees will only have to complete the sections of the form that relate to their specific grant-funded 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 \$3,696.

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 Safe Havens Program grantees to comply with the statutory reporting requirements 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 all grant-funded activities on a biennial basis and the Safe Havens Program activities specifically on an annual 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.