

Supporting Statement for Paperwork Reduction Act Submission

Office on Violence Against Women Solicitation Template

A. Justification

1. Statutorily-Mandated Need for Information

The Office on Violence Against Women (OVW) administers financial support and technical assistance to communities around the country that are creating programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault and stalking. Its mission is to provide national leadership to improve the Nation's response to these crimes through the implementation of the Violence Against Women Act of 1994 (VAWA), the Violence Against Women Act of 2000, the Violence Against Women Act of 2005 and the Violence Against Women Act of 2013. OVW pursues this mission by supporting community efforts, enhancing education and training, disseminating best practices, launching special initiatives, and leading the Nation's efforts to end violence against women.

Currently, OVW administers 3 formula grant programs and 19 discretionary grant programs, all of which were established under VAWA and subsequent legislation. Since its inception in 1995, OVW has awarded over \$5 billion in grants and cooperative agreements and has launched a multifaceted approach to implementing VAWA. These grant programs are designed to develop the nation's capacity to reduce domestic violence, dating violence, sexual assault, and stalking by strengthening services to victims and holding offenders accountable for their action. OVW posts grant program solicitations, closes solicitation periods, performs initial internal reviews, conducts peer reviews, makes funding decisions and ultimately makes awards on a staggered basis by grant program according to a master calendar that ensures that grant awards are made in a timely manner in a specific fiscal year. The date of the posting of a solicitation is set by working backwards from the date that OVW is required to award grant funds.

OVW developed a solicitation template and an accompanying Grant Program Reference Guide to assist potential grantees in applying for current OVW programs. The solicitation template ensures that all applicants to OVW grant programs will be asked to provide uniform information in a consistent manner. The information addressed in the solicitation template includes: Application for Federal Assistance; Standard Assurances and Certifications; Financial Accounting Practices; Summary Data Sheet; Proposal Abstract; Summary of Current OVW Projects; Project Narrative; Budget Detail Worksheet and Narrative; Memorandum of Understanding (MOU); Letter of Nonsupplanting; Financial Capability Questionnaire; and Indirect Cost Rate Agreement. Each solicitation will then be tailored to address the specific OVW grant program so that identification of eligible applicants, availability of funds, award period, award amount, program scope, activities that may compromise victim safety and recovery and unallowable activities will be consistent with the statutory requirements and funding amounts authorized for each particular grant program.

OVW recently revised the solicitation template to reflect changes mandated by the December 26, 2013 updates to the guidance on Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards standards (OMB Omni Circular) as well as statutory changes to the grant programs mandated by the Violence Against Women Act Reauthorization Act of 2013. A summary of these changes include:

Solicitation Section	Type of Update
Throughout Document	Link to GMS added.
Limit on Number of Application Submission <ul style="list-style-type: none"> • Template page 12 	Title updated.
Summary Data Sheet <ul style="list-style-type: none"> • Template page 13 	Link added to ‘Application for Federal Assistance (SF-424)’ when referring to the definition of the AOR.
Summary Data Sheet <ul style="list-style-type: none"> • Template page 13 	Link added to <u>new</u> Appendix E ‘Summary of Current and Pending Non-OVW Grants to do Same or Similar Work’.
Memorandum of Understanding (MOU) <ul style="list-style-type: none"> • Template page 16 	Link added to ‘Application for Federal Assistance (SF-424)’ when referring to the definition of the AOR.
Proof of 501(c)(3) Status (Nonprofit Organizations Only) <ul style="list-style-type: none"> • Template page 17 	Language added regarding 501(c)(3) as eligible entities.
Confidentiality Notice Form <ul style="list-style-type: none"> • Template page 17 	Link added to Confidentiality Notice Form.
Other Submission Requirements <ul style="list-style-type: none"> • Template page 25 	Link added to language found in ‘Submission Dates and Times’.
Application Review: Criteria <ul style="list-style-type: none"> • Template page 27 	Language update to better reflect point deductions.
Review and Selection Process: Programmatic Review <ul style="list-style-type: none"> • Template page 28 	Language moved to Application Review: Criteria section.
H. Other Information: Application Checklist <ul style="list-style-type: none"> • Template page 31 	‘Proof of 501(c)(3) Status (Nonprofit Organizations Only) [use this for Tribal Coalitions, Underserved, TSASP, SASP CSS, Arrest, Disabilities, Elder, JFF, and LAV (but specify only for tribal nonprofits)]’ added to checklist.
Appendix E “Summary of Current and Pending Non-OVW Federal Grants to do the Same or Similar Work”	Sample table added to address ‘A list of other Federal grant programs from which the applicant organization currently receives funding or for which it has applied for funding in FY

	<p>(SAMPLE)</p> <ul style="list-style-type: none"> • Template page 49 	<p>2014 to do similar work' (language found at template page 14 under 'Data Summary Sheet').</p>
	<p>D. Application and Submission Information – Financial Capability Questionnaire (if applicable)</p> <ul style="list-style-type: none"> • Template page 19 	<p>Financial Capability Questionnaire link updated: http://ojp.gov/funding/Apply/Resources/FinancialCapability.pdf</p>
	<p>D. Application and Submission Information – Indirect Cost Rate Agreement (if applicable)</p> <ul style="list-style-type: none"> • Template page 19 	<p>Language added regarding the IDC rate: “If chosen, this methodology once elected must be used consistently for all Federal awards until such time as a non-federal entity chooses to negotiate for a rate.”</p>
	<p>D. Application and Submission Information – Funding Restrictions – Program Income (if applicable)</p> <ul style="list-style-type: none"> • Template page 25 	<p>Language added to the template regarding program income:</p> <p><u>“Program Income</u> Program income is income generated from the Federally-supported activities or earned as a result of the award and requires prior approval from OVW. Program income is not a requirement for this program.</p> <p>Applicants that anticipate earning program income must include in the budget how the income will be expended. If approved, the program income will be in addition to the award amount and must be used for allowable activities or the program. Recipients that earn program income but did not anticipate earning program income at the time of the award must use the income generated for allowable activities of the program and reduce the award amount (rather than increase funds available for the program).”</p>

2. Use of Information

OVW will use the information collected to make determinations about grant awards. The solicitation template is designed so that applicants will be asked to provide specific information in a consistent manner. For example, in the Project Narrative Section of the solicitation, all applicants will be asked to include descriptions of the purpose of application, what will be done and who will implement in a separate attachment to the application that may not exceed 20 pages in length, double spaced.

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. Applicants to OVW Grant programs are required to submit their applications and supporting documentation through the Grants.gov.

4. Duplication of Information Request

In order to make federal funding decisions, OVW collects information through the submission of applications to its grant programs after posting the solicitations online. The only mechanism to apply for funding under the OVW grant programs is participation in the solicitation process.

5. Impact on Small Entities

There is no impact on small entities as the collection is necessary to secure federal funding.

6. Consequences to Federal Programs or Policy

The solicitation process including the collection of information from grant programs applicants in a consistent and uniform manner and the utilization of specified selection criteria ensures that federal funding decisions are made in an appropriate, equitable, and effective manner consistent with the statutorily authorized purposes of the VAWA grant programs and with the funding authorizations from Congress.

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 solicitation template is clear, and that the information is routinely kept and it is not burdensome for organizations to provide it in connection with their applications for federal funding under VAWA. 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 March 3, 2015(Federal Register, Volume 80, page11468) and a 30-day notice was published in the Federal Register on May 8, 2015 (Federal Register, Volume 80, page 26586). 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 funding decisions, 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 solicitation template 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 collection of the information addressed in this solicitation template is not overly burdensome. Solicitations will be completed by approximately 1800 applicants once a year. There will be 1800 annual responses and it is estimated that it will take applicants approximately 30 hours to complete an application

OVW is seeking information that is necessary to make determinations about funding decisions and the solicitation template requires applicants to provide this information in a consistent and uniform manner across the different grant programs. OVW estimates that it will take approximately 30 hours for applicants to complete an application package. OVW developed this estimate based on past experiences during the solicitation and 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 other than the staff time devoted to developing and drafting a response to the solicitation.

14. Annualized Costs to the Federal Government

The annualized costs to the Federal Government resulting from the OVW staff review of the applications submitted by prospective grantees are estimated to be \$201,600.

15. Program Changes or Adjustments

There are no program changes or adjustments for the estimates identified in Section 13 and in Section 14.

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 during the solicitation process.

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 solicitations.

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.