

THE SUPPORTING STATEMENT

A. Justification

1. Circumstances Making the Collection of Information Necessary

This request for information collection is submitted to the Office of Management and Budget (OMB) for approval of revised program announcements (Appendices A, B & C) and progress reporting forms (Appendices D, E & F) for the Family Violence Prevention and Services Program authorized under the Family Violence Prevention and Services Act (FVPSA) (42 U.S.C 10401 et seq.).

States, Tribes and State Domestic Violence Coalitions are required to submit applications for FVPSA formula grant funding (42 U.S.C. 10402(a)(2), (b)(2)) and implementing regulations (45 CFR Part 1370). The program announcements for the FVPSA formula grants currently approved under OMB Number 0970-0280 will expire in November 2014.

The Administration for Children and Families (ACF) is required to collect and report data on the provision of family violence, domestic violence, and dating violence services, including assistance and programs supported by Federal funds (42 USC 10404 (b)(3)(B)) and establish reporting requirements (42 U.S.C. 10404 (a)(3)).

2. Purpose and Use of the Information Collection

The Administration for Children and Families (ACF) has used the information collected to: a) make grant awards to eligible applicants who meet the statutory requirements and comply with other applicable regulations; b) collect uniform data on FVPSA funded programs and services from State, Territory and Tribal grantees; and c) assess the progress and impact of programs and services funded through FVPSA. The information requested allows FVPSA Program staff to monitor grantee compliance with program requirements, to assist grantees, and to collect information on program services and outcomes that are used to prepare statutorily required biennial reports to Congress on the effectiveness of FVPSA Program funding in preventing and responding to family violence.

3. Use of Improved Information Technology and Burden Reduction

The funding opportunity announcements for FVPSA grants are available each year on the internet, www.acf.hhs.gov/grants. Additionally, all Performance Progress Reports are available to grantees in an electronic format with online submission in the Online Data Collection System. Because recipients of FVPSA State and Tribal grants receive funding from multiple Federal, State and private sources, many have existing databases to collect information on services provided. Therefore, in consultation with grantees, the decision was made not to create an automated reporting system that would be duplicative. Instead, grantees will continue to pull data on program services from existing databases at the local and state level.

4. Efforts to Identify Duplication and Use of Similar Information

While respecting the need for ensuring the safety of clients who are victims of domestic violence, grantees are required to report an unduplicated count of clients served within the fiscal year within that program. Prior to the first draft of each of the Performance Progress Reports, the FVPSA Program held working groups to consult with State, Tribal and Coalition grantees on the proposed reporting requirements. Grantees confirmed that no other report provides the requested information on the scope of domestic violence prevention and intervention services offered by FVPSA grantees. In addition, there was a pilot program of the new draft Coalition PPR to determine if this was the same for this report.

5. Impact on Small Businesses or Other Small Entities

Recognizing that the domestic violence programs funded by FVPSA are continually responding to crisis situations and high demand for services, the proposed information collection efforts were kept to the minimum information required to achieve program accountability and oversight.

6. Consequences of Collecting the Information Less Frequently

ACF would be unable to exercise oversight and stewardship if information collection were not conducted. The Program would be unable to make funding determinations, to assess program effectiveness, or to focus monitoring and technical assistance where needed.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

None are applicable.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

Federal Register: The 60 day notice was published in the Federal Register on April 4, 2014 (Volume 79, Number 65, Pages 18917-18918). We responded to about six requests for copies of the draft information collection by providing copies of the information collection documents. The one set of public comments received was submitted by the National Network to End Domestic Violence in response to the proposed new Coalition PPR.

The submitted comments offered concerns about how the FVPSA Program plans to use the data collected in the Coalition Membership section. The FVPSA Program will address this concern with the grantees at the scheduled training webinars for the form. The data to be collected reflects the intent of the FVPSA legislation to ensure that culturally specific domestic violence programs have access to state coalitions for training and technical assistance.

An additional comment suggested that there be a place in the Coalition PPR to reflect the coalitions' vast work with additional stakeholders. The FVPSA Program intends to collect this information within the first narrative question and chooses not to add additional questions.

The third concern was how the FVPSA Program would use the data in reports and information sharing activities. Because the report asks grantees to report out on all of their coalitions' activities, not just the ones that were funded with FVPSA dollars, a government-issued report might make it seem that all of the coalition activities were a direct result of FVPSA funds. The FVPSA office made the decision to ask for the data this way in consultation with the Advisory Group because of the difficulty expressed by the coalitions in separating out the work of the coalition by funding source. In addition, the FVPSA Program plans to use the data submitted under the Coalition Funding section to report out the approximate percentage of the coalition activities that were supported with FVPSA funds when issuing reports.

Prior to the notice in the Federal Register, the FVPSA Program coordinated an Advisory Group made up of grantees who met for over a year to develop the draft PPR. The FVPSA Program shared the draft PPR with all of the coalition grantees at an in-person meeting and in two conference calls where feedback was solicited. The Program then conducted a pilot of the PPR where eight grantees filled out the PPR as if it were their grant report and reported back to the FVPSA Program with feedback, challenges and suggestions.

9. Explanation of Any Payment or Gift to Respondents

No gifts or payments were made to respondents.

10. Assurance of Confidentiality Provided to Respondents

This instrument only requires the submission of aggregate level data on client services to protect the confidentiality of individual level data regarding victims of domestic violence. Protection of privacy and case files is the responsibility of the grantees, but ACF may examine agency diligence in this regard through onsite monitoring or other means.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature in the FVPSA grant program announcements or reporting forms.

12. Estimates of Annualized Burden Hours and Costs

Specific estimates for the hour burden for each information collection are shown in the table below:

Instrument	Number of Respondents	Responses Per Respondent	Burden Hours Per Response	Total Burden Hours	Wage Rate	Total Hour Cost
FVPSA State Grant FOA	53	1	10	530	\$25	\$13,250
FVPSA Tribal	150	1	5	750	\$25	\$18,750

FOA						
FVPSA State Domestic Violence Coalition FOA	56	1	10	560	\$25	\$14,000
FVPSA State and Territory Grant PPR	53	1	10	530	\$25	\$13,250
FVPSA Tribal Grant PPR	150	1	10	1,500	\$25	\$37,500
FVPSA State Domestic Violence Coalition PPR	56	1	10	560	\$25	\$14,000
Total	518			4,430		\$110,750

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Responses to FVPSA Program Grant Announcements and Performance Progress Reports will, in most cases, be completed by existing staff using data collection and reporting procedures currently in place for formula grant recipients. The participants in the pilot of the new Coalition PPR indicated that some grantees may need to develop new data collection methods and infrastructure to report on the new data elements on this form. The pilot for the new Coalition PPR found that the estimated time to report is similar to the time needed to complete the current PPR.

14. Annualized Cost to the Federal Government

This information collection process is part of the normal duties and functions for the FVPSA Program and therefore no additional costs are projected to be incurred.

15. Explanation for Program Changes or Adjustments

There are no changes proposed to the Tribal PPR. However, the projected number of respondents for this form and the FOA for Tribal Program has been reduced from 200 to 150 due to the actual number of respondents in prior years only reaching 140-142. Therefore, this reduces the total burden hours from 5,620 to the projected 4,430 hours.

The only change to the State/Territory PPR is under #11 on the cover page. This asks for a list of subawardees. The additional data element is that the report now asks for a category be identified for each listed subawardee (e.g., shelter, non-shelter, coalition, tribal, culturally-specific).

The Coalition PPR is an entirely new form as the prior collection instrument for these grantees was the SF-PPR which only included narrative questions.

16. Plans for Tabulation and Publication and Project Time Schedule

Grantees will submit applications within 45 days after the announcement. Applicants are subsequently notified of awards approximately 90 days after the due date. Annual Progress Reports are due each year on December 29th. Aggregation, verification and analysis of Progress Report data will be completed by March of each year. Analysis will include totals and percentages of clients served, demographic data, client outcomes, and services provided, including tracking of trends in program clients and services. Annual data on FVPSA Program grants and services will be reported through regular budget submissions, intra-Departmental updates, biennial Reports to Congress, and other reports for grantees and the general public.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the Certification statements for Paperwork Reduction Act Submissions. This information collection does not employ statistical methods as indicated in the Information Collection Request Review and Approval System Jr., item 12.

B. Statistical Methods (used for collection of information employing statistical methods)

Proposed information collection does not employ statistical methods.