

## **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) as amended and reauthorized in 2000, 2005 and 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 25 grant programs, four of which are formula grant programs, all of which were established under VAWA and subsequent legislation. Since its inception in 1995, OVW has awarded nearly \$7 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.

The purpose of the solicitation template is to provide a framework to develop program-specific announcements soliciting applications for funding. A program solicitation outlines the specifics of the funding program; describes the requirements for eligibility; instructs an applicant on the necessary components of an application under a specific program (e.g. project activities and timeline, proposed budget); and provides registration dates, due dates, and instructions on how to apply within the designated application system. OVW is proposing revisions to the current OMB-approved solicitation template to reduce duplicative language, employ plain language, ensure consistency, outline all requirements clearly, and conform with 2 CFR Part 200, Uniform Administrative Requirements, Cost Requirements, Cost Principles, and Audit Requirements for Federal Awards. The content has largely remained unchanged although OVW did remove some sections from the template and made the information available on the OVW website through links. For example, OVW removed all of the appendices (Budget Detail Worksheet and Narrative, Legal Certifications Letter, Executive Compensation Letter, chart of awards/applications to do the same or similar work, and current OVW grant or cooperative agreements). OVW also added the section “Activities Requiring Prior Approval,” which includes conducting surveys and securing necessary approvals under the National Environmental Protection Act.

## 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

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5. The collection of information will involve the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology.

## 6. 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.

## 7. Impact on Small Entities

There is no impact on small businesses.

8. 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.

9. Special Circumstances

There are no special circumstances as identified in the specific instructions for a supporting statement for Paperwork Reduction Act Submissions.

10. Federal Register Publication

OVW has consulted with persons outside the agency who have advised that the information proposed to be collected is available to potential grantees, the annual collection of and submission of such information is not burdensome, and the solicitation template is clear. OVW has solicited public comment on this form in accordance with the requirements of the Paperwork Reduction Act. A 30-day notice was published in the Federal Register on September 13, 2018 (Federal Register, Volume 83, page 46520) and a 60-day notice was published on July 9, 2018 (Federal Register, Volume 83, page 31780).

OVW received a single public comment questioning federal funding for these grant programs. In recognition of the severity of the crimes of domestic violence, sexual assault and stalking and the inconsistent response across the country at the state and local level, Congress passed the Violence Against Women Act of 1994 (VAWA 1994) as part of the Violent Crime Control and Law Enforcement Act of 1994. VAWA was landmark legislation designed to improve criminal justice responses to domestic violence, sexual assault, and stalking and to increase the availability of services for victims of these crimes with federal funding. The federal law takes a comprehensive approach to violence against women by combining tough new penalties to prosecute offenders while implementing grant programs to aid the victims of such violence. In 2000, 2005, and 2013, Congress reauthorized VAWA grant programs as well as established new grant programs and recognized the important role this federal funding has in ending violence against women in communities across the country.

11. Payment or Gift to Respondents

There will no payment or gift to respondents.

12. 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.

### 13. 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.

### 14. 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 18 Elder Program grantees twice a year. There will be 36 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 36 hours. Elder 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 Elder 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 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 \$2016.

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 Elder 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.

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.