

## **Supporting Statement for Paperwork Reduction Act Submission**

Semi-Annual Progress Report for the Grants to Enhance Culturally and Linguistically Specific Services for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

### **A. Justification**

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

The Grants to Enhance Culturally and Linguistically Specific Services for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking (Culturally and Linguistically Specific Services Program), created by the Violence Against Women Act of 2005 (VAWA 2005), funds projects that promote the maintenance and replication of existing successful domestic violence, dating violence, sexual assault, and stalking community-based programs providing culturally and linguistically specific services and other resources. The program also will support the development of innovative culturally and linguistically specific strategies and projects to enhance access to services and resources for victims of violence against women.

Office on Violence Against Women (OVW)-funded projects include those that increase a community's capacity to provide culturally and linguistically specific resources and support for victims of domestic violence, dating violence, sexual assault, and stalking; strengthen criminal justice interventions by providing training for law enforcement, prosecution, courts, probation, and correctional facilities on culturally and linguistically specific responses to crimes of violence against women; and enhance traditional victims services through the leadership of culturally and linguistically specific programs. The Culturally and Linguistically Specific Services Program also supports projects that provide culturally and linguistically specific services for children exposed to domestic violence, dating violence, sexual assault, and stalking and that offer culturally and linguistically specific resources and services that address safety, economic justice, housing, and workplace needs of victims.

Currently, there are different statutory and regulatory reporting requirements that affect Culturally and Linguistically Specific Services Program grantees. VAWA 2000 requires all VAWA grantees, including Culturally and Linguistically Specific Services Program grantees, 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.

34 U.S.C. 10238.

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. To meet its GPRA reporting obligations and elicit more meaningful information about grantee performance, OVW has recently developed performance measures, including output measures, regarding which the Culturally and Linguistically Specific Services Program grantees must report on a semi-annual basis.

## 2. Use of Information

OVW uses data from the information collection<sup>1</sup> in different ways. OVW uses the information collected from Culturally and Linguistically Specific Services Program grantees to monitor their grant-funded activities and qualitatively assess those activities. The Culturally and Linguistically Specific Services Program grantees collect information that addresses the following grant-funded activities (different sections on the reporting form): staff, statutory purpose areas, training, community coordinated responses, education, policies, product development, public awareness, system improvement and victim services. Narrative questions at the end of these different sections enable grantees to give more detailed qualitative information about their grant-funded activities. In addition, Culturally and Linguistically Specific Services Program grantees must answer narrative questions on the status of the grant goals and objectives, what services or resources do you provide that are specifically tailored to reach the culturally and linguistically specific population, significant areas of remaining need, with regard to improving services to victims/survivors of sexual assault, domestic violence, dating violence, and stalking, increasing victim/survivor safety, and enhancing community response (including offender accountability for both batterers and sex offenders), and what Culturally and Linguistically Specific Services Program funding has allowed the grantee to do that it could not do prior to receiving the funding. There are also optional narrative questions addressing

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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.

additional information on the Culturally and Linguistically Specific Services Program grant and that ask grantees to provide qualitative information regarding the effectiveness of the grant.

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of Culturally and Linguistically Specific Services Program grantees. These may include OVW staff attendance at site visits, 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 Culturally and Linguistically Specific Services Program grantees' progress reports to assess the performance of the Culturally and Linguistically Specific Services Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how Culturally and Linguistically Specific Services Program funds are being used. In addition, information collected from Culturally and Linguistically Specific Services Program grantees will support the following OVW measures:

Number of victims receiving requested services;  
Percentage of victims requesting services who received them;  
Number of protection orders issued;  
Number of policies developed/revised;  
Number of communities with improved CCR;  
Number of victims requesting services who received them;  
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 Culturally and Linguistically Specific Services Program grantees will enable OVW to respond to statutory requirements to report on the effectiveness of grant-funded activities. The structure of the Congressional report on the OVW grant programs (cited in the previous section) includes sections that describe all OVW grant programs, the Measuring Effectiveness Initiative, the effectiveness of different interventions that are funded by OVW grant programs, and specific topics of interest. The Report also contains specific chapters with more detailed information on each OVW grant program. Much of the data collected helps OVW monitor the grants to ensure that Culturally and Linguistically Specific Services Program funds are being used for the purposes authorized by law and provides important information about the quantity of authorized activities (e.g., number of trainings, number of victims served, etc.) supported by the funds. OVW primarily relies on two sources of information to make sure that our grantees are effective. First, OVW collects data from grantees about what they do with VAWA funding; second, to support our assessment, the body of existing research evaluating responses to violence against women is examined. Further discussion about research that has found that the types of interventions supported by Culturally and Linguistically Specific Services Program funds are effective is contained in the 2016 Biennial Report to Congress on the Effectiveness of Grant Programs Under the Violence Against Women Act

<https://www.justice.gov/ovw/page/file/933886/download>) The data that OVW collects on the semiannual progress reporting forms is currently not used in connection with an evaluation of the Culturally and Linguistically Specific Services 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 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 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 grantees receiving funds under the Culturally and Linguistically Specific Services Program.

### 6. Consequences to Federal Programs or Policy

By statute, Congress has mandated that Culturally and Linguistically Specific Services 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 existence of this important and necessary grant program could be jeopardized.

### 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 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 Culturally and Linguistically Specific Services 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 December 4, 2018 (Federal Register, Volume 83, page 62604) and a 30-day notice was published in the Federal Register on February 26, 2019 (Federal Register, Volume 84, page 6159). OVW received a single comment questioning the use of federal funds for this program.

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 50 Culturally and Linguistically Specific Services Program grantees twice a year as there are 2 reporting periods- January 1 through June 30 and July 1 through December 31. There will be semi-annual responses and it is estimated that it will take grantees no more than 1 hour to complete the semi-annual progress report form. Thus, the annual reporting and recordkeeping hour burden is 100. Culturally and Linguistically Specific Services Program grantees are informed about the reporting requirements during the grant solicitation process and during the grant award process. Because the semi-annual progress report covers a six month period, grantees are not in a position to complete the form until the end of each reporting period.

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 \$5600.

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 Culturally and Linguistically Specific Services 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.