

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

### Semi-Annual Progress Report for the SASP-Culturally Specific Grant Program

#### A. Justification

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

The Sexual Assault Services Program Grants to Culturally Specific Programs (SASP Culturally Specific Grant Program), part of the Sexual Assault Services Program (SASP), was created by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA 2005), 34 U.S.C. 12511(b), and is the first Federal funding stream solely dedicated to the provision of direct intervention and related assistance for victims of sexual assault. The SASP encompasses four different funding streams for States and Territories, tribes, state sexual assault coalitions, tribal sexual assault coalitions, and culturally specific organizations. Overall, the purpose of SASP is to provide intervention, advocacy, accompaniment (e.g., accompanying victims to court, medical facilities, police departments, etc.), support services, and related assistance for adult, youth, and child victims of sexual assault, family and household members of victims, and those collaterally affected by the sexual assault.

Survivors of sexual assault from culturally specific communities frequently confront unique challenges when seeking assistance, such as linguistic and cultural barriers. Sexual assault advocates report that survivors are more inclined to seek services from organizations that are familiar with their culture, language, and background and that there is no “one size fits all” solution to adequately address these critical needs. Culturally specific community-based organizations are more likely to understand the complex, multi-layered challenges and obstacles that victims from their communities face when attempting to access services in response to the sexual assault. In addition, culturally specific community-based organizations have experience forming relationships and engaging their communities and serve a vital role in providing services that are relevant for their community.

In order to provide the most appropriate services to such victims, the SASP Culturally Specific Grant Program targets nonprofit organizations that focus primarily on culturally specific communities and have experience in the area of sexual assault or who partner with an organization having such expertise. 34 U.S.C. 12511(c). The goal of the SASP Culturally Specific Grant Program is to create, maintain, and expand sustainable sexual assault services provided by culturally specific organizations, which are uniquely situated to respond to the needs of sexual assault victims within culturally specific populations.

Currently, there are different statutory and regulatory reporting requirements that affect the SASP Culturally Specific Program grantees. First, VAWA 2000 requires all VAWA grantees, including SASP Culturally Specific 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. Information collected on the semi-annual progress report regarding performance measures, including output measures, that OVW has developed for the different types of SASP Culturally Specific Program 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 uses the information collected from SASP Culturally Specific Program grantees to monitor their grant-funded activities and qualitatively assess those activities. The SASP Culturally Specific 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, policies, product development, 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, SASP Culturally Specific 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

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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.

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 has SASP Culturally Specific Program funding allowed the grantee to do that it could not do prior to receiving the funding. There are also optional narrative questions addressing additional information on the SASP Culturally Specific Program grant and asking 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 SASP Culturally Specific 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 SASP Culturally Specific Program grantees' progress reports to assess the performance of the SASP Culturally Specific Program as a whole and to respond to Congressional, Department of Justice, and other inquiries about how SASP Culturally Specific Program funds are being used. In addition, information collected from SASP Culturally Specific 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; and
- Number of victims requesting services who received them.

Information collected from SASP Culturally Specific 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 SASP Culturally Specific 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 SASP Culturally Specific 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.

OVW has submitted the 2016 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 Disability Program awards made and the Disability Program-funded activities engaged in from July 1, 2013- June 30, 2015.

The data that OVW collects on the semiannual progress reporting forms is currently not used in connection with an evaluation of the SASP Culturally Specific 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 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 SASP Culturally Specific Program.

6. Consequences to Federal Programs or Policy

Through the VAWA 2000, Congress has mandated that SASP Culturally Specific 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 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 SASP Culturally Specific 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 March 26, 2019 (Federal Register, Volume 84, page 11325) and a 30-day notice was published in the Federal Register on May 15, 2019 (Federal Register, Volume 84, page 11325). OVW received comments that expressed concerns about federal funding for this grant program which did not address the data collection form.

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 11 SASP Culturally Specific 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 22. SASP Culturally Specific 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 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 \$1232.

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 SASP Culturally Specific Program grantees to comply with the statutory reporting requirements of 42 U.S.C. 3789 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 twice a year at the end of the reporting periods, January 1 through June 30 and July 1 through December 31. OVW is statutorily required to submit a report on the effectiveness of grant-funded activities 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 semi-annual 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.