

Supporting Statement for Paperwork Reduction Act Submission

Campus Program Grantee Needs and Progress Assessment Tool

A. Justification

1. Statutorily-Mandated Need for Information

The Grants to Reduce Sexual Assault, Domestic Violence, Dating Violence, and Stalking on Campus Program (Campus Program) strengthens the response of institutions of higher education to the crimes of sexual assault, domestic violence, dating violence and stalking on campuses and enhances collaboration among campuses, local law enforcement, and victim advocacy organizations. This program is authorized by 42 U.S.C. §14045b. Congress created the Campus Program in recognition of the unique issues and challenges that colleges and universities face in preventing and responding to sexual assault, domestic violence, dating violence and stalking. The Campus Program encourages a comprehensive coordinated community approach that enhances victim safety, provides services for victims and supports efforts to hold offenders accountable. The funding supports activities that develop and strengthen trauma informed victim services and strategies to prevent, investigate, respond and prosecute sexual assault, domestic violence, dating violence and stalking. The development of campus-wide coordinated responses involving campus victim service providers, law enforcement/campus safety officers, health providers, housing officials, administrators, student leaders, faith-based leaders, representatives from student organizations, and disciplinary board members is critical. To be effective, campus responses must also link to local off-campus criminal justice agencies and service providers, including local law enforcement agencies, prosecutors' offices, courts, and nonprofit, nongovernmental victim advocacy and victim services organizations. Campuses are encouraged to create or revitalize large-scale efforts that treat sexual assault, domestic violence, dating violence, and stalking as serious offenses by adopting effective policies and protocols, developing victim services and programs that prioritize victim safety, ensuring offender accountability, and implementing effective prevention approaches. In order to assess the effectiveness of each grant and the grant program overall, OVW seeks information that can assist in delivering enhanced training and technical assistance to Campus Program grantees and inform decisions about future implementation of this important federal grant program.

2. Use of Information

OVW will use data from the information collection in different ways. The Grantee Needs and Progress Assessment Tool will be used to determine the training and technical assistance needs of Campus Program grantees – both new and continuation grantees – throughout the life of the grant award as well measure the development of the capacity of grantees to respond and prevent violence against women on their campuses. In addition, the tool will help campuses and OVW document the impact of their grant-funded work, promote sustainability of effective intervention and prevention activities, and provide outcome-based information throughout the

life of the grant to help OVW –funded technical assistance providers and grantees make changes to the goals and objectives necessary to achieve the statutory intent when Congress authorized the Campus Program. There is a need for a more effective assessment tool that better achieves the following purposes: (1) assess grantee needs and resources related to achieving the program’s core competencies that are central to the goals of the Campus Program; (2) assess the knowledge of individuals, key staff and/or partners about sexual assault, domestic violence, dating violence and stalking throughout the life of the grant period; (3) assess the readiness and capacity of key staff to implement the goals and objectives of the Campus Program for transformational change through prevention education, training and policy development; (4) highlight strengths and weaknesses of key project staff and partners to carry out the goals of the Campus program; (5) provide information and indicators for technical assistance intervention that can be done earlier in the grant period in order to achieve better implementation results and program outcomes. This data collection tool will promote matching the specific technical assistance needs of each campus and also reflection by the grantees on their goals for the grant.

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of Campus Program grantees. OVW will use the information collected from the Semi-annual Campus Program Progress Report OMB No. 1122-0005 exp. 12/31/2017) to monitor their grant-funded activities and qualitatively assess those activities as well as 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.

The data that OVW collects on the semi-annual progress reporting forms is currently not used in connection with an evaluation of the Campus Program. OVW anticipates that data collected from the assessment drill down to practical strategies and identify gaps in project implementation that will allow options for course correction throughout the grant period.

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.

4. Duplication of Information Request

There is no other mechanism by which OVW collects information to determine grantee needs in order to influence training and technical assistance and to assess the capacity of grantees to effectively respond to violence against women on their campuses over the course of the grant award.

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 Campus Program.

6. Consequences to Federal Programs or Policy

Through the VAWA 2000, Congress has mandated that Campus Program grantees report to the Attorney General on the effectiveness of their activities funded under VAWA. See 42 U.S.C. 3789 and 42 U.S.C. 14045b(d)(2)(b). 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 Campus 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 June 28, 2019, (Federal Register, Volume 84, page 31102) and a 30-day was notice was published in the Federal Register on April 8, 2016 (Federal Register, Volume 81, page 20676). OVW did not receive any public comments.

9. Payment or Gift to Respondents

There will no payment or gift to respondents.

10. Confidentiality

The assessment tool 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 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 assessment tool is not overly burdensome. The data collection tool will be completed by 100 Campus Program grantees twice during their three year grant award period. There will be 100 annual responses and it is estimated that it will take grantees no more than 2 hours to complete the form in the first and final years of their grant award. Thus, the annual reporting and recordkeeping hour burden is 200 hours in the first and final years of their grant award. Campus Program grantees are informed about reporting requirements during the grant solicitation process and during the grant award process.

OVW is seeking basic information that is routinely kept by the Campus program grantees in the normal course of their operations. Thus, the requirement that grantees complete this assessment tool is not overly burdensome. OVW estimates that it will take approximately 2 hours 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 Campus Program and that the grantees have been apprized of reporting requirements during the solicitation process and reminded throughout the grant 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.

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 \$11,200.

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 Campus 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 once a year for internal use purposes by enhancing technical assistance delivery and product development for Campus program grantees.

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 assessment tool.

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.