### Family Violence Prevention and Services: Grants to States; Native American Tribes and Alaskan Native Villages; and State Domestic Violence Coalitions

OMB Information Collection Request 0970 - 0280

# Supporting Statement Part A - Justification

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Submitted By:
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#### SUPPORTING STATEMENT A – JUSTIFICATION

#### 1. Circumstances Making the Collection of Information Necessary

The Family Violence Prevention and Services Act (FVPSA) program within the Family and Youth Services Bureau in the Administration for Children and Families (ACF) provides formula grant funding to States, Tribes and State Domestic Violence Coalitions. States, Tribes and State Domestic Violence Coalitions are required to submit applications for the formula grant funding (42 U.S.C. 10402(a)(2), (b)(2)) and implementing regulations (45 CFR Part 1370).

(FVPSA) 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)). ACF collects this information through the FVPSA Performance Progress Reports (PPRs).

Current Office of Management and Budget (OMB) approval for the funding opportunity announcements (FOAs) and the FVPSA PPRs will expire in March 2021 (OMB #0970-0280). This information collection request is submitted to OMB for approval of revised program announcements (Appendices A, B & C) and for continued use of the previously approved PPRs for the Family Violence Prevention and Services Program authorized under FVPSA (42 U.S.C 10401 et seq.). There are no changes proposed to the previously approved PPRs.

#### 2. Purpose and Use of the Information Collection

ACF uses 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 FOAs for FVPSA grants are available each year on the internet, at Grants.gov and <a href="www.acf.hhs.gov/grants">www.acf.hhs.gov/grants</a>. Additionally, all PPRs are submitted by grantees in an electronic format in the Online Data Collection System (OLDC). This system allows grantees to submit their quantitative and qualitative data all in one central place. Having all the reports and their associated data in one system allows for easier tracking of completed and

outstanding reports and reduces errors in data input along the way. Data may be retrieved directly from the OLDC by the FVPSA program staff.

#### 4. Efforts to Identify Duplication and Use of Similar Information

While respecting the need to ensure the safety of clients who are victims of domestic violence, subawardees are required to report an unduplicated count of clients served during the fiscal year within that program. When developing the initial drafts of each PPR, 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.

Subawardees for these programs have multiple federal funding sources. FVPSA worked with other federal funders to assure that requests for data collection were in alignment with data requested by other federal agencies in order to reduce the burden on data collection at the local level.

#### 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. Data clean-up methods through FVPSA assure that only the minimum of data elements are required for the Tribal PPR, as recipients of those grants are primarily small entities.

#### 6. Consequences of Collecting the Information Less Frequently

ACF would be unable to exercise oversight and stewardship if the information was not collected. 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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29,

1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. The 60 day notice was published in the Federal Register on July 8, 2020 (Document Citation: 85 FR 41049; Page: 41049; Document Number: 2020-14673). A specific request for comments on the proposed changes to the state and tribal PPR was sent out to all of the current FVPSA grantees through our list servers. The FVPSA Program did not receive any comments.

#### 9. Explanation of Any Payment or Gift to Respondents

There were no payments or gift provided to respondents.

#### 10. Assurance of Confidentiality Provided to Respondents

This information collection 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

This information collection does not include sensitive questions.

#### 12. Estimates of Annualized Burden Hours and Costs

#### Estimates of Burden

Responses to FVPSA Funding Opportunity Announcements and Performance Progress Reports will, in most cases, be completed by existing grantee staff using data collection and reporting procedures currently in place for formula grant recipients. Most grantees spend no more than 10 hours developing and uploading their grant applications and no more than 10 hours developing and uploading their annual PPR. Both the applications and the PPRs are uploaded into the Online Data Collection System. The FVPSA Program has 52 total state grantee respondents, 56 total coalition grantee respondents, and 150 total tribal grantee respondents.

In summation, the estimated burden for annual applications and performance progress reports are calculated based on 10-hour estimates for 258 (grantee respondents for states, tribes, and coalitions) respondents for the submission of funding applications and 10-hour estimates for 258 respondents for submission of performance progress reports.

#### Estimates of Costs

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Child and Family Social Workers [21-1021] and wage data from May 2019, which is

\$24.53 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$49.06. The estimate of annualized cost to respondents for hour burden is \$49 times 4,410 hours or \$168,560. <a href="https://www.bls.gov/oes/current/oes\_stru.htm">https://www.bls.gov/oes/current/oes\_stru.htm</a>

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
FVPSA State Grants Funding Opportunity Announcement	52	1	10	520	173	\$49	\$8,477
FVPSA Tribes/Tribal Organizations Grants Funding Opportunity Announcement	150	1	10	1,500	500	\$49	\$24,500
FVPSA State Domestic Violence Coalitions Grants Funding Opportunity Announcement	56	1	10	560	187	\$49	\$9,163
FVPSA State and Territory Grants Performance Progress Report	52	3	10	1,560	520	\$49	\$25,480
FVPSA Tribes/Tribal Organizations Grants Performance Progress Report	150	3	10	4,500	1,500	\$49	\$73,500
FVPSA State Domestic Violence Coalitions Grants Performance Progress Report	56	3	10	1,680	560	\$49	\$27,440
Estimated Annual Totals: 3,440							0168,560

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

Responses to FVPSA FOAs and PPRs will, in most cases, be completed by existing staff using data collection and reporting procedures currently in place for formula grant recipients.

#### 14. Annualized Cost to the Federal Government

Processing the FOAs is part of the normal duties and functions for the FVPSA Program and therefore no additional costs are projected to be incurred. Based on a written estimate from the GrantSolutions Centers of Excellence, it is estimated that the programming costs for the Online Data Collection System for the current proposed changes to this form will be \$38,000.

#### 15. Explanation for Program Changes or Adjustments

There no change in the associated annual number of responses or annual time burden since the last OMB approval of the forms.

The 60 day notice was published in the Federal Register on July 8, 2020 (Document Citation: 85 FR 41049; Page: 41049; Document Number: 2020-14673). A specific request for comments on the proposed changes to the state and tribal PPR was sent out to all of the current FVPSA grantees through our list servers.

#### 16. Plans for Tabulation and Publication and Project Time Schedule

Grantees will submit applications within 60 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 May 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.

#### **Attachments to Supporting Statement**

- 1. Appendix A: Standing Announcement for Family Violence Prevention and Services/Grants to State Domestic Violence Coalitions
- 2. Appendix B: Family Violence Prevention and Services/Grants for Domestic Violence Shelters/Grants to Native American Tribes (including Alaska Native Villages) and Tribal Organizations
- 3. Appendix C: Standing Announcement for Family Violence Prevention and Services Grants to States for Domestic Violence Shelters and Support Services
- 4. Appendix D: State/Territory/Tribal PPR
- 5. Appendix E: Coalition PPR