

SUPPORTING STATEMENT FOR ELDER JUSTICE VICTIM NEEDS ASSESSMENT

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

At least 11% of older Americans are victims of some type of elder abuse each year, and an additional 5.4% experience financial fraud. The consequences of elder abuse victimization include psychological, social, health, and financial outcomes that are devastating and often lead to diminished quality of life. To ameliorate the effects of elder abuse, federal, state and local governments as well as community-based organizations provide services to older victims. The Elder Abuse Prevention and Prosecution Act (EAPPA) of 2017 (Sec. 101(b)(2)) instructs the US Department of Justice to identify best practices for individuals working in victim services responding to the needs of elder abuse victims. However, the Office for Victims of Crime (2013) concludes that little is known about victim services generally. Further, even less is known about the service needs of older victims (OVC, 2015), with the Office for Victims of Crime designating victims of elder abuse an underserved class (OVC, 2016). An exhaustive review of published and unpublished works determined that a comprehensive needs assessment of services specifically for elder abuse victims does not exist.

The Elder Justice Initiative intends to support a contractor, ICF International LLC in conducting a national elder abuse victim services needs assessment across successive stages of the justice process, from initial incident through investigation, prosecution (if any), and long-term recovery for each type of elder abuse (physical abuse, psychological abuse, sexual abuse, caregiver neglect, financial exploitation, financial fraud). To accomplish this goal, ICF will 1) conduct national surveys with elder justice professionals (including federal staff) and older victims and their family and friends; and 2) conduct a series of focus groups with elder justice professionals (including federal staff) and older victims and their family and friends. A targeted dissemination strategy featuring the results and recommendations will aid in elder abuse services program planning.

Elder justice-related information collection activity undertaken by the Elder Justice Initiative includes garnering qualitative stakeholder feedback in an efficient, timely manner. Qualitative feedback is not intended to yield generalizable results, but rather to provide useful insights on perceptions and opinions of our stakeholders. Information collection may include brief surveys, registration for convenings, webform requests on the Elder Justice Website, and other elder justice-related information collection activities. These information collections will provide insights into stakeholder perceptions, experiences, and expectations, focus attention on areas where communication and training are needed, and identify needed changes in operations to improve delivery of resources and services. These collections are necessary to facilitate

ongoing, collaborative, and actionable communications between the Elder Justice Initiative and its various stakeholders and contribute directly to the improvement of program management.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Although it is ideal to identify existing sources that would yield the information we seek (Barbazette, 2006), as reviewed, no national elder abuse victim services needs assessment has been undertaken. This effort fills that gap. The goal of the national elder abuse victim services needs assessment is to gain insight in to how to best meet the needs of older victims of crime, and ultimately promote healing and better outcomes for older victims. In addition, it will reduce the need for unnecessary services thereby potentially reducing costs to local, state and federal governments. This information will be solicited from victims themselves, professionals who serve those older victims, representatives of federal agencies with elder justice programming, and family and friends who are oftentimes instrumental in recovery and have a unique window into the needs of older victims. In addition, there are substantial and meaningful differences across subtypes of elder abuse in terms of prevalence (Acierno et al., 2010; Laumann et al., 2008; Williams et al., 2017), etiology (NIJ, 2013), risk factors (Acierno et al., 2010; Dong, Simon, & Evans, 2012; Gil et al., 2015), and services associated with adult protective services outcomes (Liu et al., 2022). Therefore, this study will identify the service needs of older victims for each subtype of elder abuse. Finally, victim needs vary from the incident to the investigation and prosecution phase (if any), and through to the recovery phase thereby necessitating the need to examine short- and long-term service needs (Olomi, Wright, Hasche, & DePrince, 2019). Therefore, specific service needs across these three phases will be assessed.

Upon completion of the project, a final report along with a set of recommendations will be made publicly available, in addition to research and practitioner briefs, webinars, and journal publications to ensure wide dissemination, enabling federal, state and local entities to use this information to design or enhance their service delivery system for older victims.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

As reviewed in Section A.1, this collection of information does not duplicate or collect similar information to other studies. In consulting with organizations and research partners with which the Elder Justice Initiative frequently interacts, and including a review of the existing literature, it has been determined that the information outlined in this data collection effort does not currently exist in a way that would serve the purpose of this information collection. The Bureau of Justice Statistics is undertaking a [National Census of Victim Service Providers](#) which is collecting data on all programs and organizations that serve victims of crime or abuse, and will include organizations serving elder abuse victims, but the data collection is at the organizational level and does not collect data on specific services nor what victims want in terms of services.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

The survey of elder justice professionals and older victims and their family and friends will utilize survey software to disseminate the survey instrument and collect responses. The survey software selected will reduce the participation time burden for respondents, as it will allow them to respond remotely, during time that is convenient for them, and/or over multiple visits (i.e., respondents will not need to complete the survey in one session). The use of information technology for the surveys will reduce the financial burden because respondents will not incur any travel expenses in completing the tasks. The focus groups will be virtual, facilitating ease of participation.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There is no significant impact on small business or other private entities.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Data from surveys and focus groups will be collected only once, although survey respondents will be given a wide window in which to respond (e.g., up to 4 weeks), along with a weekly reminder.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The information collection outlined herein contains no special circumstances and thus fully complies with the guidelines set forth in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-Day Notice was published in the Federal Register on October 5, 2022 (87 FR 60709). The comment period ended on December 5, 2022. No comments were received.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

Elder justice professionals and older victims will receive a \$5 gift card for participating in the survey and a \$30 gift card for participating in a focus group in appreciation of their time. It is anticipated that 1000 elder justice professionals and 1500 older victims will participate in the surveys, for a total of \$12,500 in gift cards. Up to 150 elder justice professionals and up to 150

older victims will participate in focus groups, for a total of \$9,000 in gift cards. No other participants (i.e., federal staff) in the national needs assessment will be compensated.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Recruitment of elder justice professionals and older victims and their family and friends for surveys or focus groups will not be publicly advertised. Elder justice professionals identified through the Advisory Board networks will be provided with guidance, strategies, and protocols on engaging their clients in the study, determining eligibility, and implementing the referral process for interested clients. These referrals will include family and friends of older victims who supported the victim as they received services.

Participants completing surveys will remain anonymous. Consent to participate is embedded in the recruitment correspondence. Survey respondents will not be asked to submit any personally identifying information connected to their response. All personally identifying information is voluntary and captured in a separate collector on the survey platform. All participants in the national elder abuse victim services needs assessment will be made fully aware of these parameters, confidentiality assurances, and will receive contact information for the Project Coordinator. No participant will be personally contacted after the conclusion of the project. All survey consent procedures are detailed in Appendix A and B.

Focus group participants will read (or have read to them) and acknowledge informed consent forms. Focus group responses will be captured through an audio recording (if all participants agree), notetaking, and later transcribed. The transcriptions and notes will be saved on project drives with restricted access behind ICF's firewall and, if relevant, locked in a file cabinet in a locked office at ICF for 5 years, at which time they will be destroyed. Transcripts will be retained in a similar manner, but will contain no names or any personally identifying information (only a participant number) and will not be available to the public. Only project staff will have access to the transcriptions. The final report will only present aggregate information. All focus group consent procedures are detailed in Appendix C and D.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The best way to learn from victims about what they need to recover from their victimization is to ask them, their loved ones, and the professionals responsible for assisting them (Olomi et al., 2019; Pritchard, 2000). ICF staff has extensive experience interviewing vulnerable populations as defined by Institutional Review Board guidelines. Victims often appreciate the opportunity to express their feelings about these sensitive issues and to be heard rather than feeling invisible. Empirical evidence supports the willingness of older adults to discuss these experiences

(Gagnon, DePrince, Srinivas, & Hasche, 2015). Whether the experience of participating in a survey or focus group is perceived as distressing is anticipated to differ across the various samples participating in the study. Therefore, targeted responses to potential distress will be implemented. Older adults and their family and friends may find the questions regarding needed services sensitive or it may trigger negative emotions. To address these concerns, as mentioned, recruitment of victims will occur through elder justice professionals. As part of this recruitment process, elder justice professionals are sensitive to who will be willing and able to participate and will limit their recruiting to those individuals. Further, older victims who might find participation overwhelming will likely decline to participate, but safeguards will be in place for those who agree to participate but find the experience upsetting (see Appendix B and D). For older adults, family and friends taking the survey, a link to the Elder Justice [Find Help or Report Abuse](#) webpage will be provided in the instructions, along with a clause indicating that they can stop the survey at any time for any reason. For older adults, family and friends participating in the focus group, the name and phone number of a victim specialist will be provided for their use at any time. Further, all participants will be reminded that they are free to end their participation at any point for any reason. Elder justice professionals completing the survey are not expected to perceive the questions as sensitive.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual
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	nts		es	se	Burden (Hours)
Surveys of Professionals (Private Sector)	1,000	1	1,000	20min	333hrs
Surveys of Victims (individuals/households)	1,500	1	1,500	10min	250hrs
Focus Groups (Private Sector)	100	1	300	90min	150hrs
Focus Groups (individuals or households)	200	1	200	90min	300hrs
Unduplicated Totals	2,800		2,800		1,033hrs

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory**

compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Elder justice professionals and older victims will receive a \$5 gift card for participating in the survey and a \$30 gift card for participating in a focus group in appreciation of their time. It is anticipated that 1000 elder justice professionals and 1500 older victims will participate in the surveys, for a total of \$12,500 in gift cards. Up to 150 elder justice professionals and up to 150 older victims will participate in focus groups, for a total of \$9,000 in gift cards. No other participants (i.e., federal staff) in the national needs assessment will be compensated.

Total Annual Cost Burden

Activity	Number of Respondents	Time Per Response	Total Annual Burden (Hours)
Survey	2,500	\$5	12,500
Focus Groups	300	\$30	9,000
Unduplicated Totals	2,800		\$21,500

The Elder Justice Initiative will contract with ICF International LLC to conduct this one-time only national needs assessment from conception to submission of a final report. The total time and materials estimate is based on a 78-week (18 months) timeline for a total cost of \$350,000.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

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Cost to the Federal Government

Activity	Cost
Gifts	\$21,500
Contract Support	\$350,000
Unduplicated Totals	\$371,500

15. Explain the reasons for any program changes or adjustments.

Not applicable. This is a new collection of information.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Project planning, the literature review, data collection instrument development, and IRB approval will be conducted over a four-month period. Surveys and focus groups will be conducted and analyzed over an eight-month period. Reporting and dissemination will be conducted over a six-month period.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are requesting no exemption.

18. Explain each exception to the certification statement.

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection contains statistical data.