

SUPPORTING STATEMENT FOR NATIONAL CENSUS OF VICTIM SERVICE PROVIDERS

The Bureau of Justice Statistics (BJS), through a cooperative agreement (15PBJS-21-GK-02597-RESS) with the Justice Research and Statistics Association (JRSA), Westat, and the National Organization for Victim Assistance (NOVA) requests clearance to conduct the 2023 National Census of Victim Service Providers (NCVSP). The 2023 NCVSP is part of the larger Victim Services Statistical Research Program (VSSRP) that BJS developed to capture, on a routine basis, information about the diverse programs and organizations that serve victims of crime or abuse in the United States. The first NCVSP administration was conducted in 2017 and was approved by the Office of Management and Budget (OMB) (OMB No. 1121-0355; exp. 05/31/2019). The 2023 NCVSP will be the second administration of this data collection.

The goals of the NCVSP are twofold: (1) to update and validate a national roster of victim service providers (VSPs) and (2) develop an understanding of the broad range of organizations that provide victim services as their primary function or through specific programs or personnel, including how they are structured, the types of services they offer, the types of crime victims they serve, the size of their staff, and funding sources and sustainability.

Definitions

A victim service provider (VSP) is any organization or program which provides services or assistance to victims of crime or abuse. There are different ways to categorize VSPs, but for the purpose of the 2023 NCVSP, the VSPs have been divided into two major categories, including:

- (a) Primary providers, entities that principally function to provide services to crime victims (e.g., domestic violence shelters, rape crisis centers, and homicide survivor groups); and
- (b) Secondary providers, or those that assist crime victims as one of their many functions and have a program, center, or specific staff dedicated to serving crime victims (e.g., prosecutor-based providers, hospital-based providers, and campus providers).

These categories of VSPs cover a broad range of providers that serve the needs of different types of victims, such as prosecutors' offices, other criminal justice "system-based" VSPs (e.g., police and special advocates), community-based shelters, domestic violence or sexual assault programs, mental and physical health-related programs, and tribal organizations or tribal-focused services.

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.

Title 34, United States Code, Section 10132 of the Justice Systems Improvement Act of 1979, authorizes BJS to collect and analyze statistical information concerning the operation of the criminal justice system at the federal, state, and local levels. This includes information on the capacity of the criminal justice system and partner victim service agencies to meet the needs of crime victims (see **Attachment 1**).

The proposed NCVSP will provide critical information on the current composition of the victim assistance field and changes since the 2017 NCVSP. The 2023 NCVSP is important as it will contribute to knowledge regarding victim services and address major gaps in what is known about the availability and use of services to support victims of crime or abuse.

Prior to the 1980s, crime control policy paid little attention to victims of crime. This changed dramatically in the 1980s with the creation of the Office for Victims of Crime (OVC) and other criminal justice policy and practice efforts aimed at responding to victims' needs but also accounting for their suffering. In the 1990s, OVC was joined by the Office on Violence Against Women (OVW) in supporting service provision as well as advocacy for victims of domestic violence, sexual assault, and stalking. In the past few decades, these programs have been intent on building and maintaining the service infrastructure necessary to make victims of crime whole again. Data collected through the NCVSP will provide current information on the national victim service infrastructure.

The federal government recognizes that victim assistance is important. From the time Congress created the Crime Victims Fund through the [Victims of Crime Act \(VOCA\)](#) in 1984, the federal government has provided a significant portion of the financial support for victim-serving entities. While that funding has been crucial, fluctuations in collection and disbursement from that Fund mean that amounts available for grant-making vary annually. Federal and state administrators of VOCA funds and other federal grants must have data regarding changes in the victim services network to ensure that funding is being used in a way that effectively meets the needs of crime victims. A routine collection of empirical data from VSPs is needed to understand how VSPs are staffed and resourced to provide services to victims, the types of services provided, and where there are gaps in the provision of services.

Additionally, OVC is continuing to implement recommendations in its [Vision 21: Transforming Victim Services](#) report by advancing the use of research and statistics for victim service provision. The report describes the need for research to “expand the profession’s fundamental understanding of who is affected by crime, how they are affected, what works to help victims recover from their trauma, and what other issues affect the delivery of services to victims and the protection of their legal rights” (pg. 1). It highlights the challenges for the victim services field to respond effectively to crime victims without up-to-date, accurate data, particularly when there

continue to be major changes in the nature and reach of crimes. For example, major changes in U.S. demographics, advances in technology, attitudinal shifts, and better methods for identifying victims of certain types of crime (e.g., trafficking) increase the necessity of empirical data on who has access to victim services and whether service providers are equipped to adequately respond to all crime victims. The NCVSP and related data collection, the National Survey of Victim Service Providers (NSVSP, last fielded in 2019), provide essential pieces of those data.

Most of what we know about victims of crime and their help-seeking behaviors comes from BJS's National Crime Victimization Survey (NCVS). This large, nationally representative survey of the non-institutionalized residential population collects a great deal of information on victims, offenders, the social context of the event, the harms resulting from crime, and if victims received assistance from a VSP. At this time, the NCVS asks crime victims only a few questions about service provision. BJS is currently redesigning the NCVS to include more information about whether crime victims want, know how to access, and/or do obtain services from VSPs, as well as the type of services received and victims' satisfaction with services.

The NCVS, however, cannot be our only source of data on victims of crime. A number of important population groups are omitted by design from the survey, including the homeless, children under age 12, homicide victims and their families, and institutionalized populations, such as the elderly in nursing homes and prisoners. Many crimes are relatively rare, and as a result, the victims of these rare crimes and the services they receive cannot be identified with much precision in a sample of reasonable size. In addition, for some important types of crimes (e.g., human trafficking), victim surveys may not be the best source of information on the crime and its consequences. In these cases, if we are to have a more complete picture of victims, victim survey data must be supplemented and complemented by administrative data on victims and crimes from police and victim service agencies.

In addition, the existing nationally representative data on offenses known to the police provide only a limited look at victims. In 2021, the FBI transitioned to the National Incident-Based Reporting System (NIBRS), replacing the historical Summary Reporting System (SRS), as the official data collection for crimes recorded by the police. NIBRS collects detailed information on victims, offenders, weapons, and the social context of the crime event. However, only 66% of the U.S. population is covered by NIBRS, and based on NCVS data, we know that many crimes never come to the attention of the police.¹

Furthermore, there are some questions about the victim services field that will always be best answered with data collected directly from VSPs. For example, VSPs are best positioned to provide information about how they are structured, their sources of funding, their staffing, and their capacity to meet the demand for services, as well as the factors that influence how well they can meet victims' needs.

With authorization under the Justice Systems Improvement Act and in collaboration with many stakeholders within the victim services field, BJS is well-positioned to update an empirical

¹ Bureau of Justice Statistics. (2023). National Incident-Based Reporting System (NIBRS) webpage. Accessed from <https://bjs.ojp.gov/national-incident-based-reporting-system-nibrs>.

knowledge base about the characteristics and functions of VSPs. The proposed request is to conduct the NCVSP from September 2023 to May 2024 (8 months).² The 2023 NCVSP is a critical step in obtaining a current picture of the provision of victim services.

Need for a Census of the National VSP Roster

The most important reason for conducting the 2023 NCVSP (rather than surveying a sample of VSPs) is to obtain a current list of all operating VSPs. A current list of VSPs is necessary because the victim service agencies may have updated contact information, ceased operations, changed/added services, or changed structure since the 2017 NCVSP. New agencies have also been formed. The 2023 NCVSP will benefit from the lessons learned from the administration of the 2017 NCVSP.

In order to update the 2023 NCVSP frame, the project team has collected VSP lists from across the nation, starting with national lists from federal granting agencies, such as OVC and OVW, and professional membership association lists of self-identified VSPs from groups like the Mothers Against Drunk Driving (MADD) and the National Association of Parents of Murdered Children. Additionally, web-based canvassing efforts were conducted in all 50 states to identify VSPs not covered on federal lists. All national, state, and local level VSP lists are being integrated and de-duplicated and are expected to result in a national roster of about 20,000 unique VSPs. Once the roster is de-duplicated, it will be compared to the more recent list of VSPs that were included in the 2019 NSVSP sample. See **Attachment 2** for the Canvassing Report and a complete description of the roster.

In preparation for the 2023 NCVSP data collection, the contractor reviewed the 2017 NCVSP data and codebook, as well as the results from the BJS statistical report.³ The review of the data and associated documents provided information on survey items with low data quality and high levels of missingness that needed added instructions or needed rephrasing. Additionally, BJS consulted with subject matter experts (SME) in victim service provision, victim service funding, victimization, and special victim populations to review the 2017 instrument to make modifications in problematic areas.

The NCVSP instrument is designed to be brief (15 minutes to gather data for survey + 15 minutes to complete the survey) and to obtain basic information from all active VSPs on the roster. Specifically, VSPs will be asked to provide their contact information, including the agency name, address, phone number, and email address, and information about:

- (1) The structure and type of entity and the geographical region the VSP operates (Sections A through G on the instrument; see **Attachment 3**),
- (2) The types of services provided to victims and the crime type(s) for which victims sought services in the past year⁴ (Section G),
- (3) The size of the staff (Section H),

² The 2017 NCVSP field period was from August 2016 to June 2017. Implementing the enhanced follow-up procedures will enable a shorter field period.

³ Oudekerk, B. A., Warnken, H., & Langton, L., (2019). *Victim Service Providers in the United States, 2017* (NCJ 252648). Washington, DC: U. S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. Accessed from <https://bjs.ojp.gov/library/publications/victim-service-providers-united-states-2017>.

⁴ Either the calendar year or the fiscal year, including January 1, 2023.

- (4) Funding estimates and sources (Section I),
- (5) Record keeping (Section J), and
- (6) Issues of concern to victim service providers (Section K).

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.

The information to be collected in the 2023 NCVSP is one component of the larger BJS VSSRP. The 2023 NCVSP will allow BJS to obtain a current national roster of about 17,000 active VSPs and to collect information that can be used by BJS, other DOJ entities, and external stakeholders. The data collected will have utility when used both independently and in conjunction with other existing sources of data to generate a more complete national picture of crime or abuse victims who do and do not receive assistance, how assistance is provided, and the types of assistance received.

BJS Uses:

The NCVSP will contribute new information to BJS's established portfolio of victimization research, which seeks to integrate knowledge about crime, victimization, the consequences of victimization, and the response to victimization from victims and VSPs, including both criminal justice-based and other community-based VSPs. There is not one national source of data that can offer a complete picture of the nature and characteristics of crime in the U.S. but taking a multi-level approach can provide rich data on the types of crimes reported to police, reported to victim service providers, and crimes that go unreported to police and/or formal assistance organizations. BJS is working to align information from residents, police records, and VSPs to provide a more complete understanding of where victimization occurs, the different types of victimizations experienced, whether victims access services through criminal justice or other community-based VSPs, and whether these formal assistance systems can accommodate and fulfill victims' needs for specific services and fulfill other important functions that help to prevent and reduce crime.

(1) Validating the national roster of active VSPs:

BJS will use the 2023 NCVSP to create a current national roster of active VSPs. Based on findings from a pilot test prior to the 2017 NCVSP administration, at least 15% of entities on the current list of 20,000 may no longer be in business, no longer serving victims, or are otherwise outside the scope of this type of data collection.

(2) Use the 2023 NCVSP roster as a sampling frame for future VSP surveys:

BJS will use the 2023 NCVSP roster as a sampling frame to select a nationally representative sample of VSPs for a future administration of the NSVSP. The NSVSP provides detailed information about the victim services field, including the most commonly provided services, referrals to VSPs by other organizations and entities, and gaps in services.

(3) Using the NCVSP data to develop a current empirical knowledge base about VSPs:

Information gathered through the 2023 NCVSP will be a valuable and unique source of knowledge about the current victim services field. This information can be used to fill major

gaps in knowledge about service provision to crime victims in the nation, particularly when aligned with other data collection efforts such as the NCVS. Below are examples of the pressing policy, practice, and research questions that can be addressed with data collected through the 2023 NCVSP:

- *How many active VSPs with the primary function of serving victims exist in the nation (i.e., primary VSPs)?*
- *How many VSPs receive federal funding, and what portion of federally funded VSPs exist solely to serve victims versus organizations that serve victims through dedicated personnel or named programs?*
- *What percentage of VSPs are federally funded, and how do federally funded VSPs differ from non-federally funded VSPs (e.g., in funding stability, their organizational structures, and the types of victims they serve)?*
- *What does the range of VSP structures look like in the nation?*
- *What services do VSPs provide, and what types of victimization do their clients tend to experience?*
- *Where are VSPs geographically located? Are VSPs geographically aligned with the victims who need their services, or is there a mismatch in where service providers are located in relation to where victimization occurs? In regions where there are mismatches, are victims less likely to receive services?*
- *How do staff sizes and funding stability differ across VSPs in the U.S.?*

Uses by other governmental agencies (OVC, OVW, VOCA administrators):

For OVC, the type of information that can be learned from the 2023 NCVSP is critical to having a current empirically-based approach to delivering victim services that is consistent with OVC's Vision 21 effort to transform the victim services field.⁵ Data collected from the NCVSP will yield information government agencies can use to work more effectively in helping crime victims.

The proposed 2023 NCVSP will allow federal and state granting agencies to better understand what percentage of the victim services field they are supporting, and whether there are gaps in government funding for particular types of VSPs or VSPs that offer particular types of services. In addition, basic descriptive information about the number, size, and stability of VSPs will allow federal and state entities to better understand how to allocate funding resources, seek future funding for areas of need, and plan appropriately for potential limitations or barriers to accessing funding.

Current measures on the number and range of victims served by VSPs, VSP staff sizes, and VSP budgets will also allow funders, like OVC and OVW, measure the progress and stability of the victim services field since the administration of the 2017 NCVSP.

⁵ Office for Victims of Crime Vision 21 report: http://ovc.ncjrs.gov/vision21/pdfs/Vision21_Report.pdf.

Other Uses:

It is anticipated that academic researchers and other interested stakeholders may use the 2023 NCVSP data to prepare reports and scholarly publications to examine the relationship between crime and the availability and delivery of victim services. The 2023 NCVSP public-use data files will be housed at the National Archive of Criminal Justice Data (NACJD). As of May 2023, the 2017 NCVSP public-use data file or documentation has been downloaded over 800 times.

The data will also have utility for victim advocates and victim service professionals. The 2023 NCVSP and in particular the national roster of active VSPs resulting from the 2023 NCVSP, could be directly useful to VSPs and the victims they serve. Knowing how many VSPs exist of a particular type and the types of specific services and populations they serve might be informative to other VSPs. Additionally, we plan to include a weblink at the end of the NCVSP online instrument encouraging VSPs to add their organization's information to the [OVC Directory of Crime Victim Services](#). We hope this might help facilitate better referrals and coordination of services among VSPs in the same geographical regions. Currently, VSPs lack any systematic way to benchmark their work against that of their peers. Data from the 2023 NCVSP will allow VSPs to better understand where they fall in relation to other VSPs in terms of size and scope and the types of services they provide and examine how their concerns about budget and staff align with other VSP concerns. VSPs can use this information in strategic planning and grant writing. VSPs could also use data from the 2023 NCVSP to identify areas across the nation where there might be gaps in the availability of VSPs or gaps in particular types of services. VSPs and victim advocates can use this information to reallocate funding and resources or request additional funding and resources to be used to fill those gaps.

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.

The 2023 NCVSP instrument and the procedures to collect, clean, and analyze the data have been developed based on technological advances that enhance data quality and minimize burden to survey participants and researchers. While the survey is offered through multiple modes, including a version administered by telephone, the primary mode of data collection is a web-based, self-administered survey instrument (see welcome screen presented in **Attachment 4**). In the 2017 NCVSP, the vast majority (86%) of VSPs completed the survey online.

The web interviewing capabilities are designed to assist respondents in completing their questionnaires by providing a high-quality user experience and by providing features that reduce respondent burden and ensure complete and accurate data. All web transactions will be secured through SSL encryption, and VSPs gain access via unique logins and passwords. The NCVSP instrument has been designed for online data collection using the Westat Survey Framework survey software. The software is built to allow for easy conversion of instruments from one mode to another when multi-mode surveys are desired. For example, the web instrument will also be used to administer a telephone interview for respondents who choose to respond via

telephone. This ability allows significant reductions in development effort and costs when moving from one mode to another.

In addition, the web survey has a user-friendly interface and skip patterns hide non-relevant questions. The web survey also conducts real-time, automated checking of responses for numeric range and logic error(s) and protects against data entry errors. The web survey will be programmed to include several value-add features such as (1) the capability to resume work, allowing respondents to stop responding to the instrument and return to the point of break-off at a later time without losing previously entered data; (2) embedded links within the web instrument that make it easy for respondents to submit requests for support using email; and (3) the ability to print a copy of responses to keep on file once the web survey is complete. In addition, staff will monitor the completion of surveys and, for those who time out or leave the survey early, will be able to email a link to the individual VSP's survey asking the VSP to complete the survey.

Although the web will be emphasized as the preferred mode of survey completion, some VSPs will prefer a telephone survey. Data collected over the phone will be entered into the automatic data file as they are received, noting the date and method of submission.

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 2023 NCVSP will not duplicate any other data collection efforts. The NCVSP will obtain current information about organizational functioning, types of victims served, and types of services offered from the broad range of VSPs across the nation.

Apart from the 2017 NCVSP, only one other national data collection related to victim services exists, and it is different from the proposed NCVSP in design, scope, and purpose. Annually since 2006, the National Network to End Domestic Violence (NNEDV) conducts a 1-day (24-hour) census of U.S. domestic violence shelter programs.⁶ The collection documents the number of individuals who sought services in a 24-hour period, the types of services requested, and the barriers the shelters experienced in providing services to victims of domestic violence including not being able to meet victims' needs because of a lack of resources. In contrast, the 2023 NCVSP will cover a one-year reference period and includes all VSPs providing services to domestic violence victims as well as victims of other types of crimes (rather than only VSPs that run domestic violence shelters). To ensure that data collected as part of the 2023 NCVSP will be informed by and not duplicative of the NNEDV's census work, a representative from the NNEDV provided input into the development of the 2023 NCVSP.

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

⁶ Reports are available online. See the most recent full report from 2021, <https://nnedv.org/content/domestic-violence-counts-16th-annual/>.

Many steps have been taken to reduce burden on VSP organizations and programs that participate in this data collection. Prior to receiving the online survey invitation, VSPs will be asked to gather basic information about their staff and funding with the goal of reducing the burden on the respondent while they are completing the survey.

Cognitive testing was also conducted through two rounds of testing with 51 VSPs which resulted in revising and dropping questions prior to finalizing the final instrument (see the cognitive testing report available in **Attachment 5**).

The majority of the reduction in burden on respondents in the final 2023 instrument is because we revised and simplified questions in Sections G (service provision), H (staffing), and I (funding). Question G11 asks respondents to report whether their organization provided services for victims of different crime or abuse types and asks them to select all that apply. The response options were in no particular order in the 2017 instrument. For 2023, the response options are categorized thematically which should help respondents easily find the types that are applicable to their organization. A similar approach of categorizing thematically was also used for question Q12.1 and G12.3, which asks about the types of crime or abuse the organization primarily focuses on and top population of victims served, respectively.

Section H asks about VSP staffing and was simplified to ask about current full-time, part-time, and volunteer staff. The 2017 NCVSP asked respondents for an open-ended estimate on the number of staff, however, cognitive testing for the 2023 NCVSP indicated that this proved difficult for respondents to estimate. Therefore, in the 2023 NCVSP, closed-ended categories are included for these questions.

Section I focuses on VSP funding sources and amounts. This section of questions had some of the highest levels of missing data in the 2017 NCVSP. The funding questions are complex due to the nature and variety of funding sources organizations receive, adding to the burden and creating confusion for respondents. VSPs may have grant funding that spans more than one year; they may have received funding through a state pass-through agency and be unclear about which amounts are attributed to which source. We determined that it would be valuable to gather information identifying the range of funding sources that support a VSP, even if dollar figures cannot be gathered with confidence. The 2023 NCVSP asks respondents about the total estimated annual funding and asks which types of grant(s) support their VSP.

In order to minimize burden on the respondent while completing the NCVSP, a helpdesk will be staffed to provide assistance by phone (toll-free) and email to all respondents during normal business hours (Eastern Time). Contact information for the project principal investigator will be provided to respondents.

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.

If the 2023 NCVSP is not conducted, there will be no current empirical data available to answer rudimentary questions about victim service provision in the U.S., including how many VSPs

exist, where are they located, what types of services do they offer, and the size of their staff and level of funding. The first, and most recent, administration of the NCVSP was in 2017 and there is evidence to suggest (i.e., federal funding levels and the COVID-19 pandemic) that many VSPs have opened, and many have closed in the past six years. Without this basic information about VSPs that will be collected in the 2023 NCVSP, there is no way to know what the current universe of VSPs looks like, and no way to construct representative VSP samples for research examining more detailed questions. The victim services field will continue to operate without knowing whether they are reaching all victims in need of their services or adequately meeting the short- and long-term needs of the victims they do serve. VSPs need data to benchmark their performance against the performance of other VSPs that are similar to them across the nation, and determine whether the progress they are making in serving victims is comparable to the progress being made by other VSPs. Policymakers, practitioners, and researchers need data for planning, funding, or policy-making purposes, and to understand the impact of the billions of federal dollars spent every year on victim services.

Although the call for empirical data on victim services is not new, the recent drive to transform victim services to better respond to crime victims is the impetus for the 2023 NCVSP. Beginning in 2010, OVC launched the Vision 21 strategic initiative. The final report, Vision 21: Transforming Victim Services, makes it clear that policymakers, funders, and practitioners need a comprehensive body of empirical data to guide their decision-making. The report states: *“Vision 21 stakeholders overwhelmingly expressed an urgent need to expand the knowledge base about crime victimization and effective response. They viewed research, development of evidence-based practices, and program evaluation as the foundation of successful victim services policy and practice. As the victim services field competes for scarce resources, it must have the knowledge and tools to document the value and cost-effectiveness of its services.”*⁷

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**

⁷ Office for Victims of Crime Vision 21 report, page 1: http://ovc.ncjrs.gov/vision21/pdfs/Vision21_Report.pdf.

- **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 confidentially to the extent permitted by law.**

There are no special circumstances.

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.

The research under this clearance is consistent with the guidelines in 5 CFR 1320.8(d). The 60-day notice was published in the Federal Register, Volume 88, Number 65, pages 20189 on April 5, 2023. The comment period ended on June 5, 2023. On June 5th, BJS received a letter co-signed by the Alliance for Safety and Justice and Crime Survivors for Safety and Justice (see full letter and list of recommendations in **Attachment 15**). Both organizations strongly support the NCVSP data collection and offered their assistance in conducting outreach to support the 2023 NCVSP while it is in the field. In addition, they offered a number of instrument recommendations which are outlined in Table 2, along with BJS's decision whether to implement the recommendation into the 2023 NCVSP instrument. Comments were based on the 2017 NCVSP instrument, and thus, some of the comments were already incorporated into the 2023 instrument. The 30-day notice was published in the Federal Register, Volume 88, Number 113, page 38541, on June 13, 2023.

Table 2. Public comments on the 2023 NCVSP

Comment from:	Comment:	Implementation of public comment and BJS response:
Alliance for Safety and Justice / Crime Survivors for Safety and Justice	<u>Section D: Government Agencies Only</u> Add "public defender" as a separate response option for question D1.	BJS implemented this comment.
	<u>Section E: Nonprofit or Faith-Based Organizations Only</u> Add question: "Does your organization have a contract or formal agreement with any law enforcement agency, court, corrections agency, or prosecutor's office (e.g., district attorney, police or	BJS did not implement this comment. We are hesitant to add this question without cognitive testing. <i>How formal is a formal agreement? What are the different types of an agreement? Is the</i>

Comment from:	Comment:	Implementation of public comment and BJS response:
	sheriff, probation or parole department, court, jail, pretrial services agency)?	<p><i>agreement to help with training or to display the VSP phone number and pass out referral information?</i></p> <p>We will consider this question for the next NSVSP administration.</p>
	Add question: “Is your organization co-located with a law enforcement agency, court, corrections agency, or prosecutor’s office?”	<p>BJS did not implement this comment.</p> <p>The 2023 instrument was revised to account for primary v. embedded organizations to better capture these relationships (e.g., victim services unit within a law enforcement agency).</p>
	<p><u>Section G: Services for Victims</u></p> <p>Add question to G3: “Assistance making funeral, burial, cremation, memorial, or other related arrangements for people who died as a result of violence?”</p>	<p>BJS implemented this comment.</p> <p>Added to question G8 (Other services) instead of G3 (Information and referral services).</p>
	Add question to G4: “Childcare services?”	BJS implemented this comment.
	Add question to G4: “Job training, financial literacy, or career services?”	<p>BJS implemented this comment.</p> <p>Also included “employment assistance” in question and removed from list of examples in “Other material assistance?”</p>
	Add question to G5: “Drop-in center?”	<p>BJS did not implement this comment.</p> <p>There may be variations in the definition of a drop-in center and thus, this term would need to be cognitively tested. We will consider this question for the next NSVSP administration.</p>
	Add “grief support” and “healing circles” to the examples listed in G5.	<p>BJS did not implement this comment.</p> <p>The examples in G5 (Mental health support and safety) are intended to be general. Grief support and healing circles could fall within these broader categories depending on if they were</p>

Comment from:	Comment:	Implementation of public comment and BJS response:
		informal or led by a clinician.
	Add question to G5: “Substance abuse treatment?”	<p>BJS did not implement this comment.</p> <p>The 2023 instrument was revised to include “Substance use treatment” as a question in G5.</p>
	Add “Violence prevention or intervention (street- or school-based outreach)” to question G5.	<p>BJS did not implement this comment.</p> <p>There may be variations in the definition of a violence prevention or intervention program and what falls under that umbrella term (<i>e.g., does it include school dating violence prevention programs?</i>) and thus, this term would need to be cognitively tested. We will consider this question for the next NSVSP administration.</p>
	Revise question G6: “Providing STD or HIV prophylaxis, treatment, or testing?”	<p>BJS implemented this comment.</p> <p>Revised to “Providing STD or HIV testing, prophylaxis, or treatment?” from “STD or HIV testing?”</p>
	<p>Revise question G7 to separate victim assistance navigating the criminal justice system and victim assistance as a defendant navigating the criminal justice system.</p> <p>“Assistance navigating the justice system from a victim’s perspective (<i>for example, representation, advocacy, accompaniment, assistance in exercising victims’ rights?</i>)?”</p> <p>“Criminal legal support to victims who are defendants, including defense services?”</p>	<p>BJS implemented this comment.</p> <p>Revised from “Criminal or juvenile or military or tribal justice related assistance (<i>for example, representation, advocacy, accompaniment, assistance in exercising victims’ rights?</i>)?”</p>
	<p>Revise G7 to separate between assistance with protective/restraining orders and other forms of civil justice related issues.</p> <p>“Legal assistance with protective or restraining orders?”</p>	<p>BJS implemented this comment.</p> <p>Revised from “Civil Justice related assistance (<i>for example, protective or restraining order, assistance with family law matters, assistance</i></p>

Comment from:	Comment:	Implementation of public comment and BJS response:
	“Civil legal assistance in family law, landlord or tenant, or employment matters?”	<i>with landlord or tenant matters)?”</i>
	Add “Drop-in center” to question G7.	<p>BJS did not implement this comment.</p> <p>There may be variations in the definition of a drop-in center and thus, this term would need to be cognitively tested. We will consider this question for the next NSVSP administration.</p>
	Add “Gun violence” to questions G11, G12.1, and G12.3.	<p>BJS did not implement this comment.</p> <p>The 2023 instrument was revised to add “gun violence” to the list of crimes within “Physical assault” in G11 and G12.1. Question G12.3 asks about the victim population and thus it is not appropriate to include “gun violence.”</p>
	Add “Police violence (victimization where law enforcement used force to cause injury or death)” to questions G11, G12.1, and G12.3.	<p>BJS did not implement this comment.</p> <p>VSPs have an opportunity to write in another crime type in questions G11 and G12.1 if their services target victims of police violence. Question G12.3 asks about the victim population and thus it is not appropriate to include “police violence.”</p>
	<p><u>Section K: Current Issues of Concern to VSPs</u></p> <p>Add question: “How concerned are you about your organization’s capacity to meet the needs of the victims and communities you serve?”</p>	<p>BJS did not implement this comment.</p> <p>A similar question was already added to the 2023 instrument. Question K2 asks: “How concerned are you about the ability of your victim services program to reach and serve all victims equally?”</p>
	Add question: “How concerned are you about your organization’s capacity to fundraise?”	BJS did not implement this comment.

Comment from:	Comment:	Implementation of public comment and BJS response:
		We believe this type of question is better suited for the more detailed NSVSP and will consider this question for the next NSVSP administration.

Two meetings have been held with a panel of subject matter experts (SMEs), made up of Federal partners, practitioners, and researchers that are considered experts in the victim service field. On September 9, 2022, the meeting included an overview of the NCVSP and discussed key issues related to the development of the frame for the 2023 NCVSP. The purpose of this discussion was to receive input on the question of whether the definition of VSPs still accurately reflects the current landscape of the field. It was also to identify groups of VSPs who may be missed without a special effort to include them in the frame. The second meeting, on October 19, 2022, included an in-depth discussion of four key sections within the NCVSP instrument. The purpose of this discussion was to receive input regarding approaches to identify the respondent’s organizational structure, services provided, funding, and issues of concern. The panel also helped recruit respondents for cognitive testing. The Federal partners and SME panel included:

- Jeffrey Nelson, OVC Program Management Analyst
- Ashley Russell Ellis, PhD, OVC Performance Management Specialist
- Ginger Baran Lyons, OVW Associate Director for Policy, Communications, and Evaluation
- Jean Bruggeman, Freedom Network USA
- Jeralita Costa, National Association of Victim Assistance in Corrections
- Princess Fortin, The Health Alliance for Violence Intervention
- Kim Hamm, National Children’s Alliance
- Jennifer Hiselman, Illinois Criminal Justice Information Authority
- Monika Johnson Hostler, National Alliance to End Sexual Violence
- Sarah Khan, Asian Pacific Institute on Gender-Based Violence
- Beth Meeks, National Network to End Domestic Violence
- Daisy Pagan, National Association of VOCA Assistance Administrators
- Dawn Stover, Alliance of Tribal Coalitions to End Violence
- Taylan Stulting, Campus Advocacy and Prevention Professionals Association
- Cynthia Totten, Just Detention International
- Heather Warnken, Center for Criminal Justice Reform, University of Baltimore School of Law

See **Attachment 6** for a formal listing of the SME panel.

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

No government funds will be used as payment or for gifts to respondents. VSPs will participate voluntarily and will not receive payment.

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

BJS, its employees, and its data collection agents will only use the information gathered in this data collection for statistical or research purposes pursuant to 34 U.S.C. §§ 10231 and 10134. The data collected through the NCVSP represent institutional characteristics of VSPs, not information specific to individual persons. VSPs participation in the survey is voluntary and participants will be informed prior to starting the survey that the information they provide about the VSP will be available to the public.

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.

Not applicable: there are no questions of a sensitive nature.

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.**

BJS estimates the respondent burden for the NCVSP at 8,750 hours. This estimate was calculated based on the total number of VSPs (20,000), guided by the results of the two rounds of cognitive testing. It is expected that about 15% of the 20,000 VSPs on the current roster will not be eligible because they do not provide direct victim services, will no longer be in operation, or will have stopped providing services to crime victims. For those 3,000 out-of-scope entities, the burden will be less than 5 minutes. For the 17,000 active VSPs, results from the cognitive testing

suggest VSPs will take approximately 15 minutes to gather needed data in advance, plus approximately 15 minutes to complete the survey, for a total of 30 minutes per VSP. See Table 3 for calculations.

Table 3. 2023 NCVSP Estimated Annualized Respondent Cost and Hour Burden

	Number of VSPs	Time to gather data needed	Time per survey	Total time (in minutes)	Total burden hours	Hourly rate ⁸	Monetized value of respondent time
Out of scope entities	3,000	0 minutes	5	15,000	250 hours (15,000 mins / 60 mins)	\$24.23	\$6,057.50
Active VSPs	17,000	15 minutes	15	510,000	8,500 hours (510,000 mins / 60 mins)	\$24.23	\$205,955.00
Total	20,000	--	--	--	8,750 hours	--	\$212,012.50

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

⁸ Estimates are based on the Bureau of Labor Statistics' Occupational Outlook Handbook median salary for social workers in 2021. Accessed from <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm#tab-1>.

reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices

There are no anticipated costs to respondents beyond the employee time expended in gathering advance information or completing the instrument. Respondents are not being asked to purchase anything or maintain any services as part of this data collection.

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.

The total cost to the Federal government for the NCVSP data collection is \$2,557,912, paid by BJS. BJS personnel costs are calculated based on the Office of Personnel Management’s salary table effective January 2023. BJS awarded \$2,099,941 to JRSA, Westat, and NOVA through a cooperative agreement. This cost is associated with conducting the NCVSP with a roster of 20,000 VSPs, analyzing the data, and producing BJS reports of the findings. The contractor and subcontractors’ costs include the amount spent on outreach efforts, project management, data monitoring and processing, and data documentation. The project is expected to take about three years, beginning in FY 2022 and ending in FY 2024. See Table 4 for a detailed breakdown of costs to the Federal government.

Table 4. Estimated BJS and Contractor Costs for the 2023 NCVSP

Items	Costs	Total
BJS Personnel		
GS-14 Statistician (step 5: \$150,016), 40%	\$60,006	
GS-11 Statistician (step 5: \$89,069), 15%	\$13,360	
GS-15 Supervisory Statistician (step 5: \$176,458), 10%	\$17,646	
GS-13 Editor, (step 5: \$126,949), 10%	\$12,695	
Salaries Subtotal:	\$103,707	
Fringe benefits (28% of salaries)	\$29,038	
Salary & Fringe Subtotal:	\$132,745	
Other administrative costs of salary and fringe (15%)	\$19,912	
Total staff costs	\$152,657 x 3 years	\$457,971
JRSA/Westat/NOVA cooperative agreement	\$2,099,941	\$2,099,941
Total Estimated Costs		\$2,557,912

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

The decrease in respondent burden from 9,171 hours in 2017 to 8,750 hours in 2023 is attributed to a decrease in the total number of active VSPs that are expected to be on the final roster. The

total number of VSPs was estimated based on initial deduplication of the federal and state lists of providers. In 2017, we estimated burden based on 31,000 VSPs and we are estimating 20,000 VSPs in 2023.

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.

To begin, BJS plans to release one or more statistical reports summarizing the characteristics of VSPs across the nation. The first release of the data will estimate national counts of all active VSPs with the primary function of serving victims and describe the characteristics of these providers, including:

- a. Number and types of VSPs in the United States (e.g., nonprofit or faith-based, governmental, tribal, hospital/medical or emergency, and campus)
- b. Proportion of primary VSPs receiving federal or state funding
- c. Proportion of VSPs providing specific types of services (e.g., case management, emotional support and safety, medical assistance, legal assistance, etc.)
- d. Proportion of VSPs serving different types of victims (e.g., sexual assault victims, identity theft victim, etc.)

The NCVSP data will be archived in a public use file at the National Archive for Criminal Justice Data (NACJD) and can be analyzed to provide more information in further detail. For example, the types of services provided can also be analyzed by the type of victims served to examine whether the VSPs that served a particular type of victim also provided services known to be needed among these particular victims (e.g., trafficking victims tend to need case management, legal services, and immigration services⁹). Similarly, information about whether VSP type (e.g., law enforcement, campus/educational, community-based, non-profit, etc.) and type of victim who sought services (e.g., sexual abuse victim, identify theft victim, etc.) can be analyzed to explore the frequency with which certain VSPs come into contact with types of crime victims.

In addition, BJS will develop interactive maps using the 2023 NCVSP data and county-level data from the U.S. Census Bureau. These maps were developed using the 2017 NCVSP data and show the rate of VSPs per 1,000 county residents and rate of victims served by VSPs.¹⁰

The data collection agent will coordinate closely with BJS to draft the final study report, which is expected to be a public document and will likely be published as a BJS third-party report or as an appendix to the NACJD study codebook. The goal of this report is to provide potential users of the new NCVSP data with accessible, user-friendly information about the project that will

⁹ Caliber (2007). Evaluation of the comprehensive services for victims of human trafficking: Key findings and lessons learned. <https://www.ncjrs.gov/pdffiles1/nij/grants/218777.pdf>.

¹⁰ Bernstein, O., and Morgan, R.E. (2023). *Victim Service Providers in U.S. Counties, 2017* (NCJ 305315). Washington, DC: U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. Accessed from <https://bjs.ojp.gov/victim-service-providers-us-counties-2017>.

promote and facilitate use of the results. The data collection agent will submit the final report summarizing the NCVSP administration, methodology, and recommendations for analyzing and using the data, for scholarly analysis and extracting valuable information to inform policy and identify gaps in services. They will also submit examples of code or syntax (SPSS, Stata, or SAS) that others can use to conduct basic analysis, and the final NCVSP frame data file with up-to-date contact information for all respondents.

BJS will also archive the cleaned 2023 NCVSP data through the National Archive of Criminal Justice Data (NACJD) at the Inter-University Consortium for Political and Social Research (ICPSR). The public-use data file and supporting documentation will be made available for download without charge and in multiple formats (e.g., Excel, SPSS, and/or SAS) that make it possible for other researchers, practitioners, policymakers, VSPs, and citizens to access and analyze the information. All BJS publications and products will be available on the BJS website.

Pending OMB approval, the NCVSP data collection is scheduled to begin on September 1, 2023 and be in the field through May 1, 2024 (8 months). The data collection agent, Westat, will clean and verify data on a continual basis over the course of data collection, and final data cleaning will take place in summer of 2024. The data will be delivered to BJS by the fall of 2024.

The schedule is as follows:

January- February, 2023	Cognitive Testing
September 1, 2023	Data collection begins
May 1, 2024	Data collection ends
September 2024	Data delivery to BJS
December 2024	First BJS report release/data file and documentation published

17. Expiration Date Approval

The OMB Control Number and the expiration date will be published on instructions provided to all respondents.

18. Exceptions to the Certification

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.

List of Attachments:

Attachment 1: Title 34, United States Code, Section 10132 of the Justice Systems Improvement Act of 1979

Attachment 2: 2023 NCVSP Canvassing Report

Attachment 3: 2023 NCVSP survey instrument

Attachment 4: Welcome screen for online instrument

Attachment 5: 2023 NCVSP Cognitive Testing Report

Attachment 6: 2023 NCVSP subject matter experts

Attachment 7: Prenote email and postcard

Attachment 8: Invitation email and letter

Attachment 9: Reminder email and postcard

Attachment 10: Reminder email and U.S. Mail/FedEx letter

Attachment 11: Follow-up phone prompting script

Attachment 12: Last chance email and letter

Attachment 13: Final effort to establish eligibility (IVR)

Attachment 14: 2017 NCVSP Instrument Review Report

Attachment 15: Public comment letter and list of recommendations