

Supporting Statement for Paperwork Reduction Act Submission

Semi-annual and Annual Performance Reporting Data Catalog for Formula and Discretionary Grant Programs

A. Justification

1. Statutorily Mandated Need for Information

The U.S. Department of Justice (DOJ), Office on Violence Against Women (OVW) administers grant programs authorized by the Violence Against Women Act (VAWA) and subsequent legislation and provides national leadership on issues of domestic violence, dating violence, sexual assault, and stalking. OVW grants support coordinated community responses that provide services to victims and hold offenders accountable.

Currently, there are different statutory and regulatory reporting requirements that affect OVW grant recipients. The Violence Against Women Act requires all VAWA grant recipients to report on the effectiveness of their programs to the Attorney General who, in turn, must report to Congress every two years. Section 1003 of VAWA 2000 states,

(a) REPORT BY GRANT RECIPIENTS.- The Attorney General or Secretary of Health and Human Services, as applicable, shall require grantees under any program authorized or reauthorized by this division or an amendment made by this division to report on the effectiveness of the activities carried out with amounts made available to carry out that program, including number of persons served, if applicable, numbers of persons seeking services who could not be served and such other information as the Attorney General or Secretary may prescribe.

(b) REPORT TO CONGRESS.- The Attorney General or Secretary of Health and Human Services, as applicable, shall report biennially to the Committees on the Judiciary of the House of Representatives and the Senate on the grant programs described in subsection (a), including the information contained in any report under that subsection.

34 U.S.C. § 10238.

This data collection allows OVW to meet mandated reporting requirements under 34 U.S.C. § 20124(d); 34 U.S.C. § 20125(d); 34 U.S.C. § 10463; 34 U.S.C. § 10462a(f); 34 U.S.C. § 20129(d); 34 U.S.C. § 30107(e),(f); 34 U.S.C. § 30108(g),(h); 34 U.S.C. § 12514(h); 34 U.S.C. § 12511(c)(7); 34 U.S.C. § 10446(h); 34 U.S.C. § 10448(b); 28 C.F.R. § 90.23; 34 U.S.C. § 12351(e),(f); 34 U.S.C. § 20123(f); and 34 U.S.C. § 12409.

OVW must also comply with the Government Performance and Results Act of 1993 (GPRA) (Pub. L. 103-62), which was enacted to increase Congressional and Administrative focus on the results from government programs and activities. To meet its GPRA reporting obligations and elicit more meaningful information about grantee performance, OVW has developed performance measures, which the grant recipients must report on a semi-annual or annual basis.

2. Use of Information

OVW uses data from the information collection¹ in multiple ways. With this information collection, OVW will use the information collected from grantees to monitor their grant-funded activities, identify unallowable or out-of-scope activities, and assess the impact of those activities. OVW is seeking data that includes baseline information to review activities supported with VAWA funds, including, for example, an increase in the number of victims served. OVW will review each semi-annual performance report to monitor individual grantee's performance, including the grant-funded activities, and to ensure that the goals and objectives set forth in applications for funding and award documents are met.

In addition to the proposed information collection, OVW will continue to use a number of other techniques to assess the performance of OVW grantees. These may include grantee site visits, grant-funded training and technical assistance events, staff review of products prior to dissemination, and ongoing consultation with OVW staff.

OVW will aggregate data from all grantee performance reports to assess the performance of OVW funded programs as a whole and to respond to inquiries from Congress, DOJ, the Office of the Inspector General, the public and others about how OVW grant funds are being used. Information collected from grant recipients will also enable OVW to respond to statutory requirements to report on the effectiveness of grant-funded activities. OVW completes these Congressional reports every two years, providing critical information to Congress and the public.² These reports rely heavily on this data collection.

It is important that OVW collect this information from grant recipients on a semi-annual basis so that OVW can ensure that grantees are performing within the statutory limitations of the program. Because OVW cannot perform in-person site visits with every grant recipient, the review of performance reports every six months enables OVW to monitor grant recipients in a timely manner.

¹ Under a cooperative agreement between OVW and the University of Southern Maine, data collected from OVW grantees on all of OVW's performance report forms is transmitted to the University of Southern Maine for analysis. For the analysis of the data, standard descriptive statistics (frequency, sum, percentage, mean, etc.) are used to describe the characteristics of the grantees and report basic findings.

² See [The 2024 Biennial Report to Congress on the Effectiveness of the Grant Funds under the Violence Against Women Act](#), December 13, 2024.

OVW is submitting this new information collection request to consolidate existing and previously OMB-approved information collections under a single collection with a new consolidated OMB number. Currently, OVW uses up to 19 individual OMB-approved PDF forms to collect performance and monitoring data from grantees. These forms collect different data points and may use different questions to collect information about the same activities. These PDF forms are difficult for grantees to use and make it very difficult for OVW to systematically extract and use data. The extraction process sometimes creates a delay of more than one year in accessing data. Furthermore, these static forms are very difficult to edit, especially when changes are needed due to statutory requirements or upon receiving directives from DOJ, OMB, and the White House. This new collection would simply aggregate and streamline the performance reporting process covered by the 19 previously approved collections.

While working to adapt this technology, OVW reviewed all performance reporting variables across the agency and consolidated or streamlined questions by more than fifty percent, into a centralized data catalog. All grant performance data elements will be maintained in a data catalog on a web-based platform, which builds performance reporting forms tailored to each grant program. The methodology used in this new data collection will allow OVW to leverage the best available technology to create streamlined, easy to use, and agile data collection. This process will reduce administrative burden and lead to better quality data collection.

3. Use of Information Technology

As mentioned above, OVW's prior data collection faced challenges with usability and did not allow OVW to access data quickly or make changes to the forms. This new data collection will use OVW's IMPACT Tool. The IMPACT Tool is a web-based application that allows for electronic submission of responses and leverages web development best practices. The tool uses human-centered design, such as branching and skip logic, to reduce the number of questions prompted to the user and optimize user workflows. The tool also includes built validation to catch errors early. The electronic, user-friendly format will reduce the amount of time spent navigating the reporting form and increase operational efficiency. Finally, the tool has been user tested, and elements were adjusted iteratively to improve user experience.

This system has also allowed OVW to build SQL servers and improve data processing, to meet OVW's evolving data needs. This process allows OVW real-time access to data, permitting OVW to monitor grant recipients in a more rigorous manner and become more responsive to requests for information about OVW's work. Furthermore, the use of this technology will significantly lessen the burden on grant recipients. The consolidation of questions across program forms also facilitates consistency and efficiency as

grantees collect the same data across multiple grant programs, reducing repetitive data collection.

4. Duplication of Information Request

There is no other mechanism by which OVW collects information about grant-funded activities included in this data collection. Moreover, this data collection seeks to avoid the risk of duplication by combining different PDF forms into one centralized data catalog.

5. Impact on Small Entities

There is no impact on small entities as the collection of this type of information is routinely kept during the normal course of business by most grantees receiving funds under OVW-funded grant programs. This data collection represents a reduction in the technical and administrative burden of reporting to OVW for grant recipients.

6. Consequences to Federal Programs or Policy

By statute, Congress has mandated that OVW grant recipients report to the Attorney General on the effectiveness of their activities funded under VAWA. If OVW was not able to collect the information necessary to complete these reports on behalf of the Attorney General, OVW would fail to meet a statutorily required reporting mandate. If OVW is unable to regularly collect performance reporting information from grant recipients, it will make it more difficult to identify waste, fraud, and abuse, or to identify an unallowable use of funds. Furthermore, the existence of this important and necessary work could be jeopardized. OVW-funded grant recipients assist victims of domestic violence, dating violence, sexual assault, and stalking who need critical services such as transitional housing, civil legal support, sexual assault medical forensic exams, and other related supportive services. OVW-funded grantees also hold offenders accountable by funding law enforcement and other legal efforts in communities across the country.

7. Special Circumstances

OVW uses the minimum race/ethnicity categories. Victims who receive OVW-funded services are not required to report demographic information and can self-report their racial or ethnic identity. OVW collects grantee-reported demographic data for aggregate purposes only and does not consider the data to be scientific, statistically rigorous, or representative. This is because the data is reported by the grantee and not independently verified. Given the limited scope of the data, OVW believes that adding additional categories would burden grantees, and ultimately victims, and would not deepen or enhance the utility of the data.

8. Federal Register Publication

OVW has consulted with persons outside the agency who have advised that the data proposed to be collected is available, the semi-annual collection of such data is not burdensome, the form is clear, and that the information is routinely kept by most grantees receiving funds under OVW grants. This includes OVW-hosted virtual office hours, a post-use assessment of grant-recipient experience completing performance reports and attending and presenting at New Grantee Orientations for all OVW-funded programs. OVW has solicited public comment on this form in accordance with the requirements of the Paperwork Reduction Act. A 60-day notice was published in the Federal Register on July 24, 2025 (Federal Register, Volume 90, page 34882) and a 30-day notice was published in the Federal Register on September 24, 2025 (Federal Register, Volume 90, page 45962). OVW did not receive any public comments.

9. Payment or Gift to Respondents

There will be no payment or gifts to respondents.

10. Confidentiality

Although this information is needed for a public report to Congress, it will not involve any personal information about victims that could identify them as specific individuals. This includes the personal information of the individual who submits the form, including name, email, phone number, and address. However, anecdotal, non-identifying information about the effectiveness of individual programs may be included in the report. There is no assurance of confidentiality.

11. Specific Questions

The semi-annual and annual performance reports will not contain any questions of a personal, sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Hour Burden of the Collection of Information

This collection is not overly burdensome. The total hour burden to complete the data collection form is 9,112 hours, that is 3,112 formula program grantees and subgrantees completing a form once a year with an estimated completion time for the form being one hour and 3,000 discretionary program grantees completing a form twice a year with an estimated completion time of one hour.

All OVW grantees are informed about the reporting requirements during the application process and during the grant award process.

OVW is seeking basic information that is routinely kept by the grantees, and provided to OVW, in the normal course of their operations. Thus, the requirement that grantees complete this performance report within a period of less than 30 days after receipt of it is not overly burdensome. OVW estimates that it will take approximately one hour for a grantee to complete the form. OVW developed this estimate based on the fact that

information of this nature is already kept by grantees receiving funds under OVW-funded programs and that the grantees have been apprised of these reporting requirements during the application process and reminded throughout the grant award process. The performance report is divided into sections that pertain to the different types of activities that grantees may engage in, i.e. training, product development, victim services. Grantees will only have to complete the sections of the form that relate to their specific grant-funded activities.

13. Cost Burden of the Collection of Information

OVW does not believe that there is any semi-annual and annual cost burden on respondents or recordkeepers resulting from the collection of this information, as this information is collected during the normal course of business.

14. Annualized Costs to the Federal Government

The annualized costs to the Federal Government resulting from the OVW staff review of the performance reports submitted by grantees are estimated to be \$800,000. This includes the cost of building and maintaining this data collection as well as administrative costs. We do not include any estimated labor costs for the entities collecting this information, as this is information they collect during the usual course of business.

15. Program Changes or Adjustments

There are no program changes or adjustments reported on the burden worksheet. This is an information collection that is necessary for OVW and OVW grantees to comply with the statutory reporting requirements and the Government Performance and Results Act of 1993 (Pub. L. 103-62).

16. Published Results of Information Collections

There will be no complex analytical techniques used in connection with the publication of information collected under the request. OVW is statutorily required to submit a report on the effectiveness of all grant-funded activities on a biennial basis and some program specific activities on an annual basis. Information is collected, tabulated, and presented in these reports as mandated by Congress. This data is shared in an aggregate manner and the data undergoes limited quality control, such as removing clear errors, verifying the status of a grant-recipient, or excluding non-responses. This data is understood as grantee-reported and reflects very general estimates. It is not considered scientific.

17. Display of the Expiration Date of OMB Approval

OVW will display the Expiration Date of OMB Approval in the upper right-hand corner of the IMPACT Tool.

18. Exception to the Certification Statement

OVW is not seeking any exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions, of OMB Form 83-I.