

Supporting Statement for Paperwork Reduction Act Submission

Financial Capability Form

A. Justification

1. Statutorily-Mandated Need for Information

In 1994 Congress passed the Violence Against Women Act (VAWA) in recognition of the severity of crimes associated with domestic violence, sexual assault, and stalking. Created in 1995, OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. Currently, OVW administers four formula-based and 15 discretionary grant programs, established under VAWA and subsequent legislation. The four formula programs include STOP (Services, Training, Officers, Prosecutors), SASP (Sexual Assault Services Program), State Coalitions, and Tribal Coalitions. The 15 discretionary programs work to support victims and hold perpetrators accountable through promoting a coordinated community response. Funding is provided to local and state and tribal governments, courts, non-profit organizations, community-based organizations, secondary schools, institutions of higher education, and state and tribal coalitions. These entities work toward developing more effective responses to violence against women through activities that include direct services, crisis intervention, transitional housing, legal assistance to victims, court improvement, and training for law enforcement and courts. They also work with specific populations such as elder victims, or persons with disabilities, college students, teens, culturally and linguistically specific populations.

In accordance with 2 CFR 200.205, OVW is seeking information for assessing the financial risk of an applicant's ability to administer federal funds. The form includes a mix of check box and narrative questions related to the organization's financial systems, policies and procedures. Non-governmental applicants to OVW grant programs that do not currently (or within the last 3 years) have funding from OVW must complete the form in order to obtain federal funds authorized under the VAWA.

2. Use of Information

OVW will use the information collected on the form to assess the financial risk of an applicant's ability to administer federal funds. This review of risk is required under 2 C.F.R. 200.205.

3. Use of Information Technology

The collection of information will involve the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology. Applicants are required to submit the financial capability questionnaire. The form is available on the OVW

website and can filled, signed and submitted as an attachment along with an application on JustGrants.

4. Duplication of Information Request

There is no other mechanism by which OVW collects information about the financial capability of a potential grantee.

5. Impact on Small Entities

There is a minimal impact on small entities as the collection of this type of information is routinely kept by most applicants who are seeking federal funds.

6. Consequences to Federal Programs or Policy

Through the VAWA, Congress has authorized grant programs administered by OVW and pursuant to federal regulations, OVW must collect information to assess the financial risk of an applicant's ability to administer federal funds.

7. Special Circumstances

There are no special circumstances as identified in the specific instructions for a supporting statement for Paperwork Reduction Act Submissions.

8. Federal Register Publication

OVW has consulted with persons outside the agency who have advised that the data proposed to be collected is available, the annual collection of such data is not burdensome, the form is clear, and that the information is routinely kept by most applicants seeking federal funds. 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 September 13, 2022, (Federal Register, Volume 87, page 56091) and a 30-day was notice was published in the Federal Register on November 23, 2022 (Federal Register, Volume 87, page 71681). OVW did not receive any public comments.

9. Payment or Gift to Respondents

There will no payment or gift to respondents.

10. Confidentiality

There is no assurance of confidentiality of the information submitted to OVW although OVW will not publish the information or report on it to Congress.

11. Specific Questions

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

12. Hour Burden of the Collection of Information

This financial capability form is not overly burdensome. The data collection tool will be completed by approximately 40 applicants once a year. There will be 40 annual responses and it is estimated that it will take applicants no more than 4 hours to complete the financial capability questionnaire. This is a one-time collection for organizations that have not had current funding from OVW or the Office of Justice Programs within the last 3 years. Applicants are informed about the reporting requirements during the grant solicitation process and during the grant award process.

OVW is seeking basic information that is routinely kept by applicants in the normal course of their business operations. Thus, the requirement that applicants complete this form is not overly burdensome. OVW estimates that it will take approximately 4 hours for an applicant to complete the form. OVW developed this estimate based on the fact that information of this nature is already kept by applicants in the normal course of business operations and that the applicants have been apprised of these reporting requirements during the solicitation process and reminded throughout the grant award process.

13. Cost Burden of the Collection of Information

OVW does not believe that there is any annual cost burden on respondents or recordkeepers resulting from the collection of this information.

14. Annualized Costs to the Federal Government

The annualized costs to the Federal Government resulting from the OVW staff review of the forms submitted by applicants are estimated to be \$ 2240.

15. Program Changes or Adjustments

There are no program changes or adjustments for the estimates identified in Section 13 and in Section 14. This is an information collection that is necessary for OVW to comply with federal regulations.

16. Published Results of Information Collections

The results of the Information Collection will not be published.

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 form.

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.