

May, 2007

SUPPORTING STATEMENT

Approval of the ORR-6 Performance Report

A. Justification

1. Circumstances that make collection necessary:

Designed to assist refugees, Cuban/Haitian entrants, asylees, victims of trafficking and certain Amerasians¹ integrate into American society as quickly and effectively as possible, the Refugee Resettlement Program (RRP) provides funding for--

- temporary cash and medical assistance for eligible refugees and entrants not qualified for categorical assistance, and
- support services, especially employment and English language training, to help refugees become employed and self-sufficient in the shortest time possible.

Since 1982, the Form ORR-6 (0970-0036), has been the primary reporting instrument of the Office of Refugee Resettlement (ORR) for capturing quantitative and qualitative information on these two primary functions of the agency. This information has enabled ORR to develop and maintain effective program monitoring and a system of data collection on cash assistance, services provided, and results achieved under the State-administered refugee resettlement program. Since its initial approval in October 1982, OMB has approved revisions in 1984, 1985, 1987, 1990, and 1995.

¹ A State or its designee agency(s) must provide any individual wishing to do so, an opportunity to apply for cash assistance and must determine the eligibility of each applicant as promptly as possible within no more than 30 days from the date of application; A state or its designee must inform applicants about the eligibility requirements and the rights and responsibilities of applicants and recipients under the program (45 CFR 400.50) In determining eligibility for cash assistance, the State or its designee must promptly refer elderly or disabled refugees and refugees with dependent children to other cash assistance programs to apply for assistance in accordance with 45 CFR 400.51.

ORR created the current version of the ORR-6 after considerable discussion within ORR and after lengthy consultations that stretched across two years with State Coordinators and refugee service providers. Since 1995, it has incorporated the information previously collected semi-annually in the Targeted Assistance Performance Report Form (the ORR-12, 0970-0042) and annually in the Annual Service Plan (FSA-110, 0970-0109). While the current version collects more definitive information than its predecessor on service activities and programs funded under the social services formula, the targeted assistance formula, and discretionary grants with an employment focus, comments from respondents reveal that the instructions and reporting instruments are a source of ambiguity and uncertainty over what information needs to be provided. In addition, in order to meet the requirements of the Government Performance Results Act of 1993, and in order to strengthen performance outcome information and achieve greater consistency across information collection instruments, we are undertaking a revision of the ORR-6 performance report.

All information submitted as part of the current ORR-6 is required by ORR regulations. 45 CFR 400.28(b) requires State Coordinators to report on the effectiveness of their State cash and medical assistance, social services, and targeted assistance programs: "A State must submit statistical or programmatic information that the Director determines to be required to fulfill his or her responsibility under the Act on refugees who receive assistance and services which are provided, or the costs of which are reimbursed, under the Act." The Annual Service Plan is required by 45 CFR 400.11(b)(2), which requires States to "...submit an annual plan no later than 45 days prior to the beginning of the State's annual planning cycle for social services on a form prescribed by the Director." States and state-alternative programs are required to submit the Annual Service Plan along with the third trimester report due October 31.

The revisions we propose are based upon comments received from State Refugee Agencies and Wilson-Fish Programs, local governments, and our own internal analysis with the overall objective of clarifying ambiguities, sharpening performance outcome information, and creating greater consistency across all reporting instruments used by ORR to track outcomes, including Annual Outcome Goals, economic self sufficiency measures, and other data tracking instruments. As part of our effort to create more uniformity across program areas and in an effort to streamline the information collection process, we propose trimester reporting as opposed to the previous requirement of quarterly reporting. In order to provide sufficient time for States and Wilson -Fish Programs to make the adjustment to trimester reporting, we propose to implement the new trimester reporting time frame in FY 2008, with the first four-month report due March 1, 2008.

2. Purposes and uses:

The ORR-6 is completed and returned at the end of each reporting period by the State Refugee Coordinator in each State that participates in the Refugee Resettlement Program or by Wilson/Fish Program Directors for state-alternative programs. Currently, 50 reporting entities (49 states and the District of Columbia) participate in the Refugee Resettlement Program. The

ORR-6 enables review of program information at three separate governmental levels: ORR, State agencies, and county or local service providers.

- o ORR uses data gathered from Form ORR-6 to determine the number of months of RCA and RMA use based upon appropriations. ORR also calculates State-by-State RCA and RMA utilization rates for use in formulating program initiatives, priorities, standards, budget requests, and assistance policies. Program managers analyze data on service caseloads and program outcomes to formulate national strategies to reduce refugee welfare dependency.
- o State agencies and county or local service providers use the ORR-6 to monitor cash and medical assistance levels within the local jurisdiction and for the State as a whole. Using ORR-6 data as a monitoring and evaluation tool, they establish program priorities and initiatives to develop or improve service delivery techniques for meeting the intent of the Congress in responding to the changing needs of the refugee population.

The proposed revised ORR-6 is a participation and performance level report. Also, as part of our streamlining effort, we no longer require State Agencies and Wilson-Fish Programs to supply program expenditures as part of the ORR-6 report. The revised reporting instrument clarifies more precisely than previous collection instruments what “employment service” outcome information is in need of collection and what “employability services” outcome information will need to be provided to ORR. Schedule C page 1 is revised to collect results or outcome information regarding “employment services” and Schedule C Page 2 will collect information regarding participation levels of “employability services.” This distinction eliminates ambiguities which have arisen over these terms. In addition, we have eliminated the need to report cash assistance reductions and we are providing more precise definitions of terms in the ORR-6 instructions. The proposed revisions are a step in the direction of more consistent reporting across different collection instruments, e.g., the Annual Outcome Goal Plan, Match Grant Reporting and the Annual Service Plan.

Since 1995, ORR has used the ORR-6 to satisfy the provisions of the Government Performance and Results Act of 1993 (GPRA), P.L. 103-62 to measure program performance of State programs. The cumulative performance of each State is published each year in ORR’s Report to Congress on the Refugee Resettlement Program.

Information contained in the ORR-6 continues to form a baseline against which subsequent State performance is tracked. This information is reported to Congress annually and disseminated to States and county and local offices.

In addition, data on RCA recipients is regularly matched with ORR’s refugee arrival and population data. From this data ORR is able to look at individual State cash assistance trends relative to changes in the flow of new arrivals.

3. Improved information technology:

All data and information reported on the ORR-6 are available from two sources-- the State's management information system and the monthly reports from contract service providers. To minimize the reporting burden of this data collection process, ORR does not require sophisticated data analysis at the State level for ORR-6 submissions. All ORR-6 submissions are processed in ORR micro-computers to produce the detailed analyses necessary for program monitoring and management purposes.

4. Duplication:

ORR has no other mechanism for collecting data on the size and distribution across categories of either the caseload of the cash and medical assistance population or for service and performance outcomes for social services and targeted assistance grants. ORR staff has extensive contact with States and national non-profit organizations and are certain that no similar data collection effort exists.

5. Small businesses:

Not applicable; grantees are States or non-profit refugee service agencies with Wilson/Fish alternative program grants.

6. Frequency of collection:

Except for the Annual Service Plan, data historically has been reported quarterly. Under this proposed revision, data will be reported on a trimester basis (March 1; June 30; October 31). In order to give States time to adjust to the new system, the first trimester report will be due March 1, 2008. ORR's need for the ORR-6 data is magnified by the fact that it is working with 50 respondents including states and jurisdictions involving a great diversity of services and assistance programs operated independently under various local regulations and laws. Regular reporting has been prescribed by ORR to fulfill its managerial oversight of the program, to develop policies for refugee assistance and services, and to provide national direction and guidance to state programs.

The ORR-6 requires State Coordinators and Wilson/Fish Directors to present their services plan document only once per year. However, the due date for submission of this information has been synchronized to ensure that ORR receives the revised Annual Service Plan from all States on October 31 which coincides with the date for the last trimester ORR-6. The information required on the revised service plan is representative of the ORR-funded services currently available to refugee populations and, as such, is more useful to ORR than an advance planning document.

7. Special circumstances:

Not applicable. The information collection is consistent with all OMB guidelines specified at 5 CFR 1320.6.

8. Consultation:

ORR notified all State Coordinators and Wilson/Fish Program Directors of the expiration of the current ORR-6 through State letter #07-04 dated January 19, 2007. We also issued a 60-day notice in the Federal Register on January 29, 2007 (Vol. 72 No. 18) and a 30-day notice on April 26, 2007 (Vol. 72 No. 80). ORR received numerous comments.

Comments and Responses:

Specific comments are addressed below:

** Letter received from the State of Wisconsin Department of Workforce Development dated March 9, 2007*

Comment: If caseload information on the ORR-6 and Annual Plan are to be consistent then the definitions need to be consistent, Need to include assessment, recredentialing, and assistance with the EAD as part of caseload.

Response: We agree with this recommendation and we are moving toward aligning service components and definitions of the ORR-6 and Annual Outcome Goal Plan

Comment: Eliminate the two time periods for monitoring RCA entered employment-make C one row

Response: We have decided to not adopt this change. We intend to track outcomes at 0-4 months and 0-8 months for RCA entered employments. This will give us rich data on the timing of those transitioning to entered employment and the effectiveness of program services and align performance outcome information with our Economic Self Sufficiency measures. Data on entered employment should be the unduplicated number of those who entered employment for the reporting period.

Comment: Eliminate program expenditures row- can't separate expenditures. Wisconsin doesn't contract for employment services and social services separately. Certain services would be impossible to separate. Expenditure data is appropriately captured on 269.

Response: We have decided to adopt this recommendation. The ORR-6 form will be used to track participation and outcomes from "Employment Services" and "Employability Services" funded with ORR, including services listed under 45 CFR 400.154 for programs under the social services formula program, the targeted assistance formula program, and specific employment-focused discretionary grants.

Comment: Schedule C: page 2: If this is designed to report services only under 45 CFR 400.154 (b)-(j), where do we report services provided under 45 CFR 400.154 (k) and 45 CFR 400.155? We have been using Section 4 Other Services up to now to report these, but that is not consistent with the instructions.

Response: We have revised the instructions to make clear that Schedule C: page 2 is for reporting information on participation levels of “Employability Services” under 45 CFR 400.154 (b) through (k). “Employability Services” means “services as specified in 45 CFR 400.154 (b)-(k) designed to enable an individual to obtain employment and to improve the employability of work skills of the individual.” With respect to “Other Services” under 45 CFR 400.155, we are not requiring reporting of information on those services; however, States can opt to address those services in their report narrative.

Comment: For all categories, clarify the point in time used for determining which time category to report the participant.

Response: We believe the instructions are clear on time periods for reporting data.

Comment: Eliminate the program expenditures row

Response: See comment above. We have decided to adopt this suggestion.

Comment: Clarify ELT completion. Is it successful completion of a course or advancement to next level?

Response: We have decided to eliminate the “completion line.” Open enrollment practices render unanswerable this reporting requirement. Our intent is to capture information on the number of participants in ELT during the reporting period.

Comment: For case management and other services, eliminate the “incidences” line.

Response: We have adopted this suggestion as current instructions advise programs not to report “incidences.”

Comment: ORR may wish to encourage performance by having the states indicate in the narrative what other services are and what outcome measures the state uses, whether vendors are meeting performance targets, performance improvement measures.

Response: See previous comment re: “Other Services.” We encourage state refugee resettlement agencies and Wilson-Fish Programs to include in their narrative information about “other services” provided under 45 CFR 400.155 as well as information on state or local outcome measures, information on whether vendors are meeting performance targets, and strategies to improve performance.

Comment: Clarify definition of grant terminations-For many states the payment standard and the eligibility standard are not the same. We count a grant termination when an individual receives a job which makes him/her ineligible for cash assistance or when a second wage earner gets a job which puts the household above eligibility standard of 115% of poverty.

Response: We understand that States have different standards for determining grant terminations. We make clear in our revised instructions that grant terminations are defined as “closing of a cash assistance case due to earned income from employment in an amount that is predicted to exceed or exceeds the State’s eligibility standard for the case based on family size.”

* *Letter from Mike McKay, Director of Refugee Services, Catholic Charities, Diocese of San Diego, California dated March 16, 2007*

Comment: Might data reported on the Annual Service Plan be reported according to 0-8 months and 9-60 months rather than the current format that uses the 1-12 months and 13 to 60 months?

Response. We have chosen to not adopt this suggestion. The state contract period is typically 12 months. The report merely asks States for their service contract information at the beginning of the Federal Fiscal Year. For that reason we feel we need to stay with the current time periods for reporting information.

**Letter from the New York State office of Temporary and Disability Assistance dated March 6, 2007.*

Comment: List immigration statuses early on in narrative and indicate term “refugee” applies to all other statuses.

Response: Our revised instructions list immigration statuses early in the instructions in the background section.

Comment: First Paragraph states that the data to be reported is the total number of initial preventive health screenings completed during the quarter. However contract cycle is different from the Fiscal Year. The data is received from contractors after the end of a contract quarter (when they submit their claim for payment).

New York requests that they report to ORR the total number of initial preventive health screenings “claimed” during the quarter for persons who were new arrivals at the time the health screening was completed.

Response: To address this timing issue, we have revised the ORR-6 Schedule B to request information on the unduplicated number of recipients of medical screening during the reporting period.

*Comment: **Employment Services- (Page 7 Schedule C)*** The instructions are unclear whether states are to report Programs on separate Schedule C Worksheet. Would there be a Schedule C for Refugee Social Services and a separate one for Targeted Assistance? We request that the narrative include a specific instruction on this.

Response: We have adopted this suggestion and made clear in the ORR-6 instructions which ORR programs States are to report on separate Schedule C Worksheets.

Comment: Entered Employment-Page 8 Item C- The last paragraph is confusing if it refers to the QPR. Perhaps this instruction refers to the Annual Goal Plan. If it does refer to the QPR then we request that there be clarification on the meaning of “at the end of the year”. If it does not refer to the QPR then request that it be deleted.

Response: We have deleted the last paragraph as it appears to refer to information for a report other than the ORR-6.

* *Letter from the State of Colorado , Colorado Department of Human Services dated March 16, 2007*

Comment: There is confusion between “Employability Services and “Employment Services.” Instructions need to change if participation is determined solely by employment services. If participation is determined by participation in all of the services listed in instruction 45 CFR 400.154 (a), (c), (d), and (e) then title of page needs to change to “Employability Services.”

Response: Our revised instructions make clear the difference between “Employment Services” and “Employability Services.” Schedule C, page 1 is used to report outcomes from Employment Services funded with ORR dollars to refugees and other eligible populations. The term “Employment Services” includes “development of a family self-sufficiency plan and an individual employability plan, world of work and job orientation, job clubs, job workshops, job development, referral to job opportunities, job search, and job placement, and follow up.” (45 CFR 400.154 (a). The employment services outcomes reported are those directly related to job placements. “Employability Services” means “services as specified in 45 CFR 400. 154 (b)-(k) *designed to* enable an individual to obtain employment and to improve the employability of work.” Our revised instructions make it clear that Schedule C, page 2 is to be used for reporting “Employability Services. We have renamed the form Employability Services. This form requests information on participating in English Language Training, On- the- Job Training, Case Management and other “Employability Services”..

Comment: Need to clarify the difference between “caseload” and “active participants.” Once employability and employment resolved there will be no need to track active participants.

Response: We have removed from revised instructions and forms the term “active participants.” We will still need information, however, on “total caseload.”

Comment: In past totals (mid page) recorded total full time entered employment (combined male and female) and total part time entered employment (combined male and female)...that was more helpful in looking at total entered employment and comparing that to active participants and coming up with a percentage.

Response: We have determined not to accept this comment. As the ORR-6 is used to report employment services across all employment-focused programs, i.e., Targeted Assistance Grants which often target secondary wage earners, we believe it very useful to track information by

gender in analyzing the impact and effectiveness of refugee programs on different target populations.

Comment: Schedule C, page 2—Section 1-3 of this page refers to other services under 45 CFR 400.154. Instructions provide no regulatory guidance for what constitutes the “other services” under Section 4. Perhaps this section should refer to “all other services” listed under Section 400.155.

Response: See previous comment. Our revised instructions make clear that Schedule C, page 2 is for reporting information on participation in “employability services” under Section 400.154 (b)-(k). As for services provided under Section 400.155 we do not require reporting on those services though they may be voluntarily reported in the narrative.

Comment: Section 1 should remove “completions” as Colorado has an open enrollment ELT program to better support early employment. Also, it is difficult to interpret completions for populations that are preliterate or never went to school in their native country.

Response: We have decided to adopt this recommendation by dropping the request for completions of English Language Training.

Comment: Section 1 and 2 need greater clarification as to which programs are to be counted. Matching grant clients are also eligible to utilize ELT and Skills Training Programs. Should Matching Grant Program clients be included or excluded from the count?

Response: Information on Match Grant Program clients utilizing ELT and Skills Training Programs are reported by the Match Grant Program. Therefore, Match Grant clients should not be reported in the Total Caseload count.

Comment: Section 3 and Section 4 should remove row B in each for “incidences” as this is poorly defined.

Response: We have adopted this recommendation and removed the term “incidences.”

* *Letter from Steve Walker, Refugee Coordinator for the State of Ohio dated March 1, 2007*

Comment: State in instructions which grants are to be included in the ORR- 6

Response: We have adopted this recommendation and have specified which grants are to be included in the ORR- 6 in the introductory section of the instructions.

Comment: Formatting of instructions not consistent. No logical progression. Document does not flow well.

Response: We have made numerous changes to instructions and forms which should address logical progression, consistency and flow of document.

Comment: It is not clearly stated if the Service Plan is a projection for the next year or a report on the current year.

Response: We believe the Annual Service Plan is clear on this point. The ORR-6 instructions have been expanded to indicate, “Due to differences in State contracting cycles, ORR does not specify that the contract period coincide with the Federal fiscal Year (FFY). Instead, this information is to reflect each State's 12-month period of services under contract effective at the beginning of a Federal Fiscal Year, October 1, regardless of when that period begins and ends.” .

Comment: Form does not identify that employability services only is what are to be reported on.

Response: See previous comment. We have made clear that Schedule C, page 2 is an Employability Services Report and that form is to be used to report information on employability services, e.g., English Language Training; On-the- Job Training; Skills Training; and Case Management. Section 4 is for other Employability Services (Sections 400.154 (b) through (k)).

Comment: In RMA section we understand that ORR wants enrollees, yet the form asks for those eligible.

Response: We have revised instructions to make clear that information is to be provided on the unduplicated number of “recipients”.

Comment: Clarify note in 111.A2 RMA cost.

Response: We are no longer requesting cost information and have made revisions in ORR-6 to reflect that change.

* *Letter from State of Minnesota dated February 26, 2007*

Comment: Need common definitions of “Program”, “Program Narrative”, “Yearly Goals” and “Objectives”, “Milestones”, “other service outcomes” (under bullet #2), and program initiatives.

Response: We want to afford the states some flexibility here. We believe these terms have commonly understood meanings. We have replaced the term “milestones” with “interim objectives.”

Comment: Revise Schedule C Page 1 and Page 2 so that Page 1 provides information regarding results or outcomes and Page 2 provides information and expenditure levels-Move Rows A, B, and G from Page 1 to Page 2.

Response: We have made some adjustments in Schedule C, Page 1 and Page 2 so that Page 1 provides information on Total Caseload and employment service outcomes and Schedule C, Page 2 provides information on participation in Employability Services during the reporting period. Program expenditures are no longer required in this revision.

Comment: Define “Other CA”.

Response: Our revised instructions improve the definition of “other cash assistance.”

Comment: Schedule C, Page 2 “program expenditures” seems misleading as ORR is wanting to collect information on services (e.g., ELT, OJT, skills training)

Response: We have eliminated “program expenditures” from the forms as we will no longer request information on program costs in the ORR-6 report.

Comment: Align Schedule C, Page 1 with Annual Outcome Goal Plan so that “Other CA” is accounted for and cash terminations are reported.

Response: We are moving in the direction of aligning this category of cash grant in the Annual Outcome Goal Plan with ORR-6. The revised ORR-6 instructions defines “other cash assistance” and requests information on “other cash assistance” cash terminations.

Comment: ORR will significantly benefit if we develop a more systematic process for reporting other information and performance indicators on services provided under 45 CFR 400.155 as these services are equally critical in sustaining initial outcomes reported on Schedule C, page 1 and generating other measurable outcomes. We also believe it is very feasible to develop a more systematic performance measurement framework on services under 45 CFR 400.155 so that inputs (costs), outputs (participation levels) and results (outcomes) are measured and reported. By reporting this additional information, states will be able to fully and routinely inform ORR how refugees are served in various states/communities, how such refugees are self supporting and integrating, and the challenges facing all communities and states.

Response: As stated previously, ORR makes clear in revised ORR-6 instructions that information on “Other Services” under 45 CFR 400.155 can be included on a voluntary basis but is not required. Other “employability services” under 45 CFR 400.154 (b)-(k) are to be reported on Schedule C , Page 2.

Comment: Develop a Page 3 and a Page 4 Schedule C designed like Page 1 and Page 2. Page 3 will provide outcomes of service provided under 45 CFR 400. 155 and Page 4 to provide participation and cost levels.

Response: We have decided to not adopt this recommendation. As mentioned previously, information of 45 CFR 400.155 is not required but can be provided voluntarily in the narrative or supplemental charts.

* *Letter from State of California dated March 16, 2007*

Comment: There is confusion between the terms “employment services” and “Employability Services” Double definition could be reason why in FY 2006-2007 many counties and states reported 45 CFR 400.154 (a), (c), (d), and (e) under the Funds Section of the AOGP, instead of just reporting 45 CFR 400.154 (a).

Under Schedule C, Page 2-in this section 45 CFR 400.154 (b) through (j) are referred to as “Employability Services”.

ORR has more recently referred to “Employability Services as consisting of 45 CFR 400.154 (a), (c), (d), and (e).

Not clear whether term has been narrowed to 45 CFR 400.154 (a), (c), (d), and (e) or still includes all services listed under the heading “Employability Services”.

Response: As mentioned above, our revised instructions make clear the difference between “Employment Services” and “Employability Services.” These revised instructions we believe eliminate any ambiguities from prior instructions.

Comment: On page 8 under the heading Item C, **Entered Employment**, it states: “Entered Employment is defined as the entry of an Active ES participant”. It appears that the term “ES” refers not only to Employment Services but also to OJT, Skills Training, ET, etc. The acronym “ES” should be changed so that it is consistent with ORR terminology.

Response: We have eliminated the acronym “ES” from the instructions and have defined the terms “Employment Services” and “Employability Services” and used those terms where applicable. We believe this should eliminate any ambiguities around these terms.

Comment: On page 7 under heading Grant# and names it says: “If the services reported are funded by the social services formula program (SS) or targeted assistance formula program (TAP)... “the terms “Social Services Formula”, “Formula Social Service Program Allocations, and social services grants” have all been used interchangeably for grants provided under 45 CFR Part 400 Subpart I—Refugee Social Services. Similarly, the terms “Targeted Assistance Formula Grant Program,” and “Targeted Assistance Program allocations have all been used interchangeably for formula grants provided under 45 CFR Part 400, Subpart I.

Response: We make clear in revised instructions which programs need to report the ORR-6 information.

* *Comments from Jennifer Cochran Massachusetts Refugee Health Coordinator dated March 19, 2007*

Comment: In Massachusetts health assessments are returned to the refugee health program only when the health assessment is complete, not after the initial visit. There may be a time lag in

documenting health assessment engagement. RMA billing costs generally do not correspond to this number as bills are submitted on completion.

Propose alternative to documenting the number of initial assessments:

Massachusetts suggests:

1. Health assessment linkage appointments.
2. Health assessments documented. The # of health assessments documented during the quarter

Response: We have addressed this concern by requiring on Schedule B the unduplicated number of recipients of medical screenings during the period. We have indicated that respondents may voluntarily report other information on health assessments, medical screenings, timeliness of screenings, information on refugee health conditions, plans to address health concerns of refugees or best practice type of information in the narrative.

Comment: For A2, I would suggest that actual RMA costs billed during the quarter be reported (not inclusive of administrative or state costs).

Response: As stated previously, we no longer require program expenditure or cost information as part of the ORR-6 report.

9. Payment or gifts to respondents: None

10. Assurance of confidentiality:

ORR-6 data consist of aggregated State-wide figures and do not involve client confidentiality.

11. Sensitive questions: None.

12. Annual Burden Estimates

Respondents :

Annual Burden Estimates

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
ORR-6	50	3	3.875	581.25

Estimated Total Annual Burden Hours:

581.25

13. Estimate of the annual cost burden to respondents:

The total estimated burden on respondents is 581.25 hours (See number 12 above). Assuming the value of respondents' time is \$25.00 per hour, the estimated annual cost to the respondents is \$14,531.

14. Estimate of Burden to the Federal government

We estimate that, for the first three reporting periods of the fiscal year, review and analysis of the ORR-6 data on cash and medical assistance and employment services by ORR staff will require two hours per State for each ORR-6 submission.

For the reporting period, it is estimated that review of the Annual Services Plan combined with review of the ORR-6 data, calculation of annual performance rates and RCA participation rates will require four hours per State for each ORR-6 submission.

It should be noted that the time required for ORR staff review and analysis of the Annual Services Plan is included in the estimates of four hours per state per submission.

The estimate of hours required for review of all submissions is 564 hours per year. At \$25 per hour, the cost to the Federal Government for all submissions will be \$14,100 yearly.

15. Changes in burden:

There is reduction in burden due to the a change in frequency of collection from quarterly to trimester and the elimination of the need to report program expenditures.

16. Publication:

A summary of ORR-6 data is published in ORR's Report to Congress. In addition, ORR will prepare a summary report and condensed analysis of ORR-6 data to be used primarily for program management and monitoring purposes.

17. Approval not to display expiration date: N/A

18. Certification Statement: None