

THE SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

The information collection, Refugee Data Submission System for Formula Funds Allocations, replaces the ORR-11 Refugee State of Origin Report and is designed to satisfy the statutory requirements of the Immigration and Nationality Act (INA). Section 412(a)(3) of the Act requires the Director of the Office of Refugee Resettlement (ORR) to make a periodic assessment, based on refugee population and other relevant factors, of the relative needs of refugees for assistance and services and the resources available to meet those needs. This includes compiling and maintaining data on the secondary migration of refugees within the United States after arrival.

Further, INA 412(c)(1)(B) states that formula funds shall be allocated based on the total number of refugees, taking into account secondary migration.

In order to meet the statutory requirements, ORR requires each state to submit disaggregated individual records containing certain data elements for eligible refugee populations. This revised collection differs from the ORR-11 Refugee State-of-Origin Report process, whereby states submitted the ORR-11 form containing aggregate data on the number of refugees and entrants served whose "area numbers" (the first three digits of the social security number) fell into each of several designated numerical ranges. ORR used the information on the ORR-11 to measure secondary migration for the purposes of formula funds allocation to states. The revision is proposed due to the realization that:

- 1) The Social Security Administration states that the first three digits of social security numbers (area number) should not be used for any other purpose than as an individual identifier for book-keeping purposes.
- 2) It is possible for individuals to apply for social security numbers from any social security office, not just offices in the state in which they were born or first resided. This is particularly likely in metropolitan statistical areas where individuals may live in one of several states (e.g., the Washington Metropolitan Area). In these cases, the area number of the social security number may be unreliable as a measure of refugees' state of initial resettlement.
- 3) In recent years, the Social Security Administration has begun to issue social security numbers whose area number is not connected to any specific state.

The submission of individual records via the Refugee Data Submission System for Formula Funds Allocations website is a more reliable and secure process for collecting data for the purposes of tracking secondary migration and allocating formula funds. Data submitted by the States via the secure website are compiled and analyzed by the ORR data contractor for the

purpose of refugee formula funds allocation. The contractor also prepares a summary report, which is included in ORR's Annual Report to Congress.

2. Purpose and Use of the Information Collection

This information collection, which allows States to submit individual records on eligible refugee populations via the Refugee Data Submission System for Formula Funds Allocations website, is a reliable and secure process for collecting data for the purposes of tracking secondary migration and allocating formula funds. Data submitted by the States via the secure website are compiled and analyzed by the ORR data contractor for the purpose of refugee secondary services formula funds allocation, per a formula described at INA 412(c)(1)(B).

3. Use of Improved Information Technology and Burden Reduction

This information collection improves upon the past ORR-11 Refugee State of Origin Report information collection by utilizing improved information technology. The data submission website allows States to upload data files and gives ORR the ability to provide verification to States of receipt of the data, perform front-end editing to reject invalid data immediately after receipt with explanation of reasons for rejection, and allow States to resubmit corrected files. This process has ensured that States' final data submissions are complete and correctly formatted to maximize probability of accurate data matching and formula allocations. Because the system maximizes accuracy, it reduces burden on respondents. Further, the website itself is secure, and ORR issues usernames and passwords to only two users per State.

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are available from other sources. Though ORR receives data from many sources on refugee populations present in the U.S., there are no available data that track secondary migration of refugees from the state of initial resettlement. ORR must collect data on these individuals, as well as other populations whose data may be incomplete in our system, directly from grantees.

5. Impact on Small Businesses or Other Small Entities

None.

6. Consequences of Collecting the Information Less Frequently

If information is not collected on an annual basis, ORR will be unable to meet the requirements under INA Secs. 412(a)(3) and (c)(1)(B), and it will be unable to distribute formula funds to assist refugees in obtaining the skills which are necessary for rapid self-sufficiency.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The Refugee Arrivals Data System, to which data submitted through this information collection is added, is a Privacy Act System of Records.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

First Federal Register Notice citation: Federal Register / Vol. 73, No. 194 / Monday, October 6, 2008 / Notices p. 58245.

No comments received.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

The Refugee Arrivals Data System, to which data submitted through this information collection is added, is a Privacy Act System of Records.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Secondary Migrant File for Formula Funds Allocations	50	1	6.68	334
Asylee File for Formula Funds Allocations	50	1	6.66	333
Entrant File for Formula Funds Allocations	50	1	6.66	333
TOTAL				1,000

Annual Hour Burden is estimated based on ORR's understanding of the data collection methodologies utilized by States to meet this information collection requirement. It is an average, since some States will have a larger burden based on type and number of individuals

served, number of grantees, and strategy for gathering data. The time needed to upload and validate data should not vary from State and State, as long as instructions are followed.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

No annual marginal cost burden associated with information collection (only costs are associated with the use of existing resources, e.g. staff, PCs, etc.).

14. Annualized Cost to the Federal Government

No additional annual cost to Federal Government as a result of this information collection; cost of website submission system development and maintenance is included in existing Refugee Arrivals Data System contract.

15. Explanation for Program Changes or Adjustments

The information collection, Refugee Data Submission System for Formula Funds Allocations, replaces the ORR-11 Refugee State of Origin Report. The change in burden hours associated with the revised information collection is due to the fact that data on individuals must now be collected and uploaded by states to the website submission system (as compared to submitting in aggregate on the ORR-11 form). This creates program change which increases burden by 575 hours.

16. Plans for Tabulation and Publication and Project Time Schedule

Data submitted by the States via the secure website are compiled and analyzed by the ORR data contractor for the purpose of refugee secondary services formula funds allocation. The results of the analysis are tabulated and published as part of the Final Notices of Refugee Social Services and Targeted Assistance Formula Allocations. Data submission via the website is slated to be complete by February of each year, with data analysis complete by April and publication of the final notices by mid-summer.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Data submission will be done via a website system, with files directly uploaded to the system. OMB expiration date and disclaimers will be displayed on website home page.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

None.