JUSTIFICATION FOR MINOR CHANGES TO FORM ORR-1

The Office of Refugee Resettlement (ORR) proposes four minor changes to Form ORR-1, OMB No. 0970-0030, Expiration 2/28/2011. Grantees are required to submit the ORR-1 to provide ORR with their estimates of what their fiscal year costs will be under the Refugee Cash and Medical Assistance program. The ORR-1 also constitutes the grantee's application for assistance under this program. The intent of the proposed changes is to make the form clearer and easier for grantees to use. ORR anticipates that these changes will have no effect on burden.

Change Row Heading "Health Screenings" to "Medical Screenings"

ORR is proposing that one word in the heading for the second row in the table be changed. Instead of the current "Health Screenings," the heading would be "Medical Screenings." This change would bring the terminology of the table into accordance with ORR's regulatory language at 45 CFR Part 400. Also, "Medical Screenings," rather than "Health Screenings," is the phrase most commonly used by both ORR staff and grantees for this service. This change from "Health" to "Medical" is expected therefore to make the form easier for grantees to understand and complete.

Change the Second Row in the Table to Two Rows

The current second row of the table is intended for estimates for two CMA program components: "Medical Assistance: RMA recipients" and "Medical Assistance: Health Screenings." The intent of the form was that grantees would fill in estimates for "Medical Assistance: Health Screening" in the top part of the row and for "Medical Assistance: RMA Recipients" in the bottom part of the row. This arrangement has proved to be confusing to grantees. ORR therefore proposes to have two separate lines for these two CMA program components to clarify the intent that estimates are to be entered for both components.

Change the Order of Two Programs

In the current ORR-1, "Health Screenings" precedes "Medical Assistance: RMA Recipients" in the second row. In conjunction with changing the second row to two rows, ORR proposes to reverse the sequence so that the second row will become "Medical Assistance: RMA Recipients"

and the third row of the table will be "Medical Screenings." ORR is proposing the sequence change for two reasons:

- Fewer grantees participate in the "Medical Screenings" program than participate in "Medical Assistance: RMA Recipients" and
- "Medical Assistance: RMA Recipients" is similar to the program in row one ("Cash Assistance: RCA Recipients") in that both programs provide ongoing benefits to clients determined ineligible for other public assistance programs for up to eight months. Having "Medical Assistance: RMA Recipients" directly follow "Cash Assistance: RCA Recipients" will facilitate filling in the estimates. In contrast, "Medical Screenings" is a one-time cost per client program for an individual medical screening.

Change the Fourth Row in the Table to Two Rows and Change Requirement for Cost Estimate for Child Welfare Services Administration to Annual Estimate Only

The current ORR-1 requires that the grantee report estimates for "Administration" differently for three of the program components than it does for the fourth component. ORR proposes to make the requirement the same for all four program components. This change can be accomplished by adding one line to the table.

The ORR-1 requires that estimates for service costs for three of the four CMA program components: "Cash Assistance: RCA Recipients"; "Medical Assistance: RMA Recipients"; and "Health Screenings" be derived by calculating average monthly unit costs and average monthly recipients/users and then calculating an annual total based on multiplying the estimated monthly unit costs by the estimated monthly recipients by twelve months. With regard to the "Administration" costs for these three program components, however, the ORR-1 requires only an estimate for the fiscal year.

The requirement for estimates for "Child Welfare Services for Unaccompanied Minors (including Administration)" differs in that it asks that the estimated monthly unit cost include both estimates for the costs of the child welfare services and for the cost of State and local government administration of the program component. ORR believes that handling

"Administration" estimates for Child Welfare Services in this manner has been an extra burden for grantees. ORR proposes therefore to add an additional row to the ORR-1 requiring only a single fiscal year estimate for State and local government administrative costs. The requirement for average monthly unit costs and average monthly recipients would be retained for Child Welfare Services only.