

September 5, 2012

SUPPORTING STATEMENT

Approval of the ORR-6 Performance Progress Report

A. Justification

1. Circumstances Making the Collection of Information 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;
- support services, especially employment and English language training, to help refugees become employed and self-sufficient in the shortest time possible; and
- child welfare services, including foster care, independent living and other services to assist unaccompanied refugee minors (URM).

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 primary functions of the agency. This information has

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.

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.

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, child welfare services, 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.

2. Purposes and Use of the Information Collection:

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, RMA and URM 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, medical and child welfare 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 ORR-6 is a participation and performance level report. ORR no longer requires State Agencies and Wilson-Fish Programs to supply program expenditures as part of the ORR-6 report.

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/RMA recipients and unaccompanied minors are regularly matched with ORR's refugee arrival and population data. From these data ORR is able to look at individual State assistance trends relative to changes in the flow of new arrivals. In order to best enable data matching and program analysis for unaccompanied minors, ORR is now requesting that States provide data according to each URM program location.

In response to feedback from States, ORR has streamlined the unaccompanied minors section of the report to reduce duplication between sections.

3. Use of Improved Information Technology and Burden Reduction:

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 computers using excel spreadsheets to produce the detailed analyses necessary for program monitoring and management purposes.

4. Efforts to Identify Duplication and Use of Similar Information:

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, unaccompanied minors 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. Impact on Small Businesses or Other Small Entities

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

6. Consequences of Collecting the Information Less Frequently

Data is reported on a trimester basis (March 1; June 30; October 31). 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 is synchronized to ensure that ORR receives the 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 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 Relating to the Guidelines of 5 CFR 1320.5

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

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

ORR issued a 60-day notice in the Federal Register on July 3, 2012 (Volume 77, Issue 128) and notified all State Coordinators

and Wilson/Fish Program Directors of the expiration of the current ORR-6 on July 10, 2012. ORR received few comments.

Comments and Responses:

Specific comments are addressed below:

* Email received from Normanne Rothermel, Pennsylvania State Refugee Coordinator on August 2, 2012.

Comment: Burden estimate for completing ORR-6 is higher in Pennsylvania when combining time it takes contractors and state to prepare the report.

Response: While it may take longer to prepare ORR-6 report in Pennsylvania, the ORR projected time for report reparation and submission estimate is the average time on a national level.

* Letter received from Hiram Ruiz, Director of Refugee Services from Florida Department of Children and Families dated August 31, 2012.

Comment: Florida cannot identify Matching Grant clients as they are not within the jurisdiction of the state.

Response: ORR's intent is to identify sources of new Refugee Cash Assistance enrollments. Florida can satisfy this requirement by reporting Matching Grant or any other unidentifiable clients under the Matching Grant column as "other".

Comment: New format seeks RCA cases closed "due to employment", when the technical reasons for a case closure in our system is "income".

Response: In fact, ORR-6 is not asking for case closure information due to employment, but asks specifically for "terminations due to income from employment".

Comment: We have identified number of instances in which the data sought are not defined.

Response: ORR has provided detailed instructions and has conducted ORR-6 webinar training for states and plans to continue to assist and provide technical assistance and training to states.

Comment: Annual burden of the report is higher in Florida than one estimated by ORR.

Response: See response to Pennsylvania on the same issue.

* Email received from Alison Stratton, Refugee and Immigrant Health Coordinator at the Connecticut Department of Public Health on July 24, 2012.

Comment: Planning and preparation activities for emergency operations should be reported annually instead of each trimester.

Response: Regular trimester update is needed to provide for any changes in planning and preparations to the plan proposed in the annual State Plan.

Comment: Collecting detailed requested health data is time consuming and may not be always accurate or complete information from providers.

Response: ORR's needs good data on refugee health and overall refugee well-being. States are encouraged to follow medical screening guidelines State Letter 12-09 issued on 07/24/12 and report outcomes on trimester basis.

* Letter received from Thuan Nguyen, Chief of the Refugee Programs Bureau, California Department of Social Services on August 31, 2012.

Comment: California needs additional clarifications on employment definitions.

Response: ORR regulations provide definitions for employment terminology and ORR will offer additional training to California.

Comment: Employability category should include age 51 and over instead 51-65 refugees.

Response: ORR agrees and is changing this data element to include 51 and over refugees.

9. Explanation of Any Payment or Gift to Respondents

None

10. Assurance of Confidentiality Provided to Respondents

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

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

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	3.88	582
Estimated Total Annual Burden Hours:				582

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

The total estimated burden on respondents is 581.25 hours (See number 12 above). There is no cost burden associated with this information collection.

14. Annualized Cost to the Federal Government

There is no cost to the Federal Government.

15. Explanation for Program Changes or Adjustments

There are no program changes or adjustments.

16. Plans for Tabulation and Publication and Project Time Schedule

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

None