

**THE SUPPORTING STATEMENT**  
**Ethnic Community Self-Help Program Data Indicators (ECSH Data Indicators)**  
Office of Refugee Resettlement  
Administration for Children and Families

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

Statutory Authority: Immigration and Nationality Act § 412(c)(1)(A), 8 U.S.C. § 1522(c)(1)(A)

Grantees of the Office of Refugee Resettlement's (ORR) Ethnic Community Self-Help (ECSH) Program are required to submit the Standard Performance Progress Report (SF-PPR) to the Administration for Children and Families (ACF) semi-annually, as identified in Section VI.3 of the Funding Opportunity Announcement (FOA) HHS-2016-ACF-ORR-RE-1129. However, the information collected through the SF-PPR is often broad, variable, and does not allow for the collection of specific performance indicators. This makes it challenging for the Program Office (PO) to assess the ECSH Program's overall effectiveness in terms of its three main objectives in a uniform manner. The three main objectives are:

- 1) To strengthen ECBOs' provision of culturally and linguistically appropriate services to refugees within five years after their initial resettlement;
- 2) To support ECBOs' organizational development and engagement in capacity building by encouraging their collaboration with established refugee service providers and mainstream organizations; and
- 3) To support ECBOs in promoting community building and civic participation by refugee individuals and refugee community members.

With the implementation of the ECSH Data Indicators, the PO will be able to better gauge the Program's progress for evaluation and reporting purposes.

The ECSH Indicators are mentioned in HHS-2016-ACF-ORR-RE-1129 in the following sections:

- **Section I. Post-Award Requirements, ECSH Data Indicators**

ORR will be seeking approval from the Office of Management and Budget (OMB) for information collection under the Paperwork Reduction Act (PRA) on the ECSH Data Indicators for post-award reporting. Data points will include, but are not limited to:

- o Number of refugees enrolled
- o Types of services provided
- o Number of partnerships developed or strengthened through the program

*NOTE: Consistent with the PRA of 1995, 44 U.S.C. §§ 3501-3521, under this FOA, ORR will not conduct or sponsor – and a person is not required to respond to - a collection of information covered by such Act, unless it displays a currently valid OMB control number. ORR will be seeking approval of its ECSH Data Indicators through the OMB Office of Information and Regulatory Affairs. ORR will not request this information if these data indicators are not approved at the*

*time that reports are due. Please see Section VI.3. Reporting for more information.*

For more information on application requirements specific to this FOA, please refer to Section IV.2 The Project Description.

- **Section IV.2 The Project Description, Program Performance Evaluation Plan**

In addition, applicants must include a description of how the program intends to address and collect information for the ECSH Data Indicators, as referenced in Section I. Post-Award Requirements, ECSH Data Indicators.

- **Section V.1 Criteria, Performance Evaluation Plan**

The application clearly describes the strategy for collecting and validating data related to expected outcomes, in addition to ECSH Data Indicators as referenced in Section I. Post-Award Requirements, ECSH Data Indicators, for use in program management, monitoring, and evaluation. The method proposed for collecting outcome data is timely and reasonable. The description of the data collection tools and the data management system are thorough. (0-4 points)

## **2. Purpose and Use of the Information Collection**

The ECSH Data Indicators will primarily be used by the PO to assess the progress of the ECSH Program in terms of the Program's three main objectives in a uniform and systematic way. All grantees funded under HHS-2016-ACF-ORR-1129 will be provided with an electronic copy of the ECSH Indicators through GrantSolutions with due dates that match the SF-PPR submissions (April 30<sup>th</sup> and October 30<sup>th</sup>). The PO will request grantees to fill and submit the ECSH Indicators by uploading them to GrantSolutions as a Grant Note as part of their semi-annual reporting. The retention period of the information collection (IC) will match that of the SF-PPR.

## **3. Use of Improved Information Technology and Burden Reduction**

As mentioned in A2, an electronic copy of the IC will be provided to grantees through GrantSolutions. Grantees will be able to access and submit the IC electronically by uploading it to Grant Solutions as a Grant Note. This will allow the PO and grantees additional flexibility in regards to how and when they access the IC. Additionally, GrantSolutions is an effective way to collect the ECSH Data Indicators because any documents that are submitted through GrantSolutions are an official record of grant actions and can be accessed by different program staff.

## **4. Efforts to Identify Duplication and Use of Similar Information**

Besides the SF-PPR, grantees are not required to submit any other reports to the PO. Therefore any chance of duplication that may occur would be through the SF-PPR. Though it is possible that some information that grantees choose to include in the SF-PPR may be similar to that requested in the ECSH Indicators, it is by no means certain that this will be the case, besides

basic identifying information ('Recipient Organization', 'Federal Grant Number', etc.). As mentioned in A1 above, the impetus for this IC was to require grantees to report on specific data points, which the PO found was challenging to collect previously in a consistent way through the SF-PPRs alone.

#### **5. Impact on Small Businesses or Other Small Entities**

The PO is very cognizant of the fact that the IC will likely impact small non-profits, who may have limited budgets and/or staff for data collection and evaluation, and intentionally designed the ECSH Indicators to be minimally burdensome. The ECSH Indicators is a short document that requests only targeted information related to the ECSH Program's three main objectives. Because the information requested is related to the main objectives, the PO expects that most grantees will plan to track this information as part of their service provision process and therefore will not be additionally burdensome. Also, the IC is submitted electronically, allowing grantees to save on printing and mailing costs.

#### **6. Consequences of Collecting the Information Less Frequently**

If the collection is conducted less frequently than semi-annually, the PO's ability to assess and monitor the ECSH Program will be affected, particularly when responses to the IC could also signal project implementation issues that require technical assistance from the PO. If the IC is not conducted at all, the PO will be at a significant disadvantage since it will be unable to have a systematic method of collecting specific data from all grantees, which in turn will limit its ability to evaluate the Program overall.

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

There are no special circumstances relating to the guidelines of 5 CFR 1320.5.

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

There were no comments received on 81 FR 37198, published 6/9/2016.

#### **9. Explanation of Any Payment or Gift to Respondents**

The IC does not involve any payment or gift to respondents.

#### **10. Assurance of Confidentiality Provided to Respondents**

The IC does not require an assurance of confidentiality.

#### **11. Justification for Sensitive Questions**

The IC does not include sensitive questions. All participant data is collected in aggregate form at the project level.

#### **12. Estimates of Annualized Burden Hours and Costs**

**Table 1. Annual Burden Estimate**

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
ECSH Data Indicators	10	2	1	20

**Table 2. Annual Cost Estimate**

Instrument	Number of Respondents	Estimated Hourly Wage*	Total Cost
ECSH Data Indicators	20	\$30.54	\$610.80

\*Source: Department of Labor; U.S. Bureau of Labor Statistics; Social and Community Service Managers, 2015 Median Pay.

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

The IC does not involve additional annual direct costs to respondents beyond the burden described under item 12.

**14. Annualized Cost to the Federal Government**

There is no cost to the federal government for this IC.

**15. Explanation for Program Changes or Adjustments**

This is a new IC so there are no program changes or adjustments.

**16. Plans for Tabulation and Publication and Project Time Schedule**

As mentioned above in A3, the IC will be accessed by the PO through GrantSolutions semi-annually after each due date. The PO will review and aggregate the data by entering it into an Excel spreadsheet. The aggregated results will be shared internally at ORR, and may be included in ORR's Annual Report to Congress.

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

ORR will clearly display the OMB approval number and expiration date on the IC.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

ORR is not seeking an exception to certifications for this IC.

**B. Statistical Methods**

Not applicable.