Descriptive Study of the Unaccompanied Refugee Minors Program

OMB Information Collection Request
New Collection

Supporting Statement

Part A

FEBRUARY 2019

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Points of Contact:
Tiffany McCormack
Gabrielle Newell

Table of Contents

Overview

- **Status of the study**: This is a new information collection as part of the Descriptive Study of the Unaccompanied Refugee Minors Program.
- **Program:** The Office of Refugee Resettlement (ORR) in the Administration for Children and Families (ACF) administers the Unaccompanied Refugee Minors (URM) Program, which serves refugees and other eligible youth within the U.S. who do not have a parent or relative available to care for them. Two national voluntary resettlement agencies, Lutheran Immigration and Refugee Service (LIRS) and the United States Conference of Catholic Bishops (USCCB), and their affiliated local agencies, are responsible for making appropriate placements and ensuring that URM youth receive the services they need. In April 2018, LIRS and USCCB oversaw a network of 22 URM programs in 15 states, which served nearly 1,800 youth. Each URM program parallels the child welfare systems in the states where they operate. Services provided include arranging foster care, group homes, independent living situations, or reunification with relatives in the U.S., as well as other child welfare services to promote youths' well-being. The program also includes services focused on integrating the youth into their new communities while preserving the youth's ethnic and religious heritage. However, providers' implementation of these services differs from program to program.
- **Type of study:** This is a descriptive study.
- **Utility of the information collection:** This study will provide information on the services provided by the URM Program, strategies to deliver these services, and data collected on URM youth. This study will address these gaps in knowledge by collecting consistent data across URM programs, documenting and analyzing existing data, and engaging with service providers and URM youth to learn about the experiences of URM youth in the Program. It aims to provide a foundation of information to inform future evaluations and research.

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for a descriptive study to better understand the range of child welfare services and benefits provided through the Unaccompanied Refugee Minors (URM) Program.

The proposed data collection activities described in this justification will be used to identify the types of services offered under the URM Program, how services and benefits are administered, how services are implemented with different sub-populations, types of data collected and systems used by URM programs, types of policies in place regarding URM programs, challenges faced by youth and URM programs, innovative and interesting practices, and expected outcomes of URM Program participants. This justification provides supporting statements for each of the eighteen points outlined in Part A of the OMB guidelines.

A.1.1 Study Background

The Descriptive Study of the URM Program is sponsored by the ACF Office of Planning, Research, and Evaluation. The Office of Refugee Resettlement (ORR) administers the URM Program, which serves refugees and other eligible youth within the U.S. who do not have a parent or relative available to care for them.

Two national voluntary resettlement agencies, Lutheran Immigration and Refugee Service (LIRS) and the United States Conference of Catholic Bishops (USCCB), and their affiliated local agencies, are responsible for making appropriate placements and ensuring that URM youth receive the services they need. In April 2018, LIRS and USCCB oversaw a network of 22 URM programs in 15 states, which served nearly 1,800 youth. Unaccompanied refugee minors enter the URM Program through several different routes: (1) youth may be deemed refugees overseas and are resettled in the United States with the help of the resettlement agencies; (2) they may obtain asylum status by coming to the United States and applying for asylum at a port of entry or after entering the country; (3) they may be Cuban/Haitian entrants; (4) they may be victims of human trafficking with a letter of ORR eligibility or T Visa; (5) they may have been granted a U Visa as a victim of crime; or (6) they may come through the custody of the Office of Refugee Resettlement as unaccompanied children and are granted Special Immigrant Juvenile classification or status (SIJS).

Each URM program parallels the child welfare systems in the states where they operate. Services provided include arranging foster care, group homes, independent living situations, or reunification with relatives in the U.S., as

well as other child welfare services to promote youths' well-being. The program also includes services focused on integrating the youth into their new communities while preserving the youth's ethnic and religious heritage. However, providers' implementation of these services differs from program to program.

There has been very little research about how the services are provided by URM programs and how the strategies are used to prepare URM youth for self-sufficiency. The field currently lacks an understanding of what data is collected about URM youth and how data may be used to inform service providers or assess how URM youth fare after they exit the program. This descriptive study will address these gaps in knowledge by collecting consistent data across URM programs, documenting and analyzing existing data, and engaging with service providers and URM youth to learn about the experiences of URM youth in the Program. This descriptive study aims to provide a foundation of information to inform future evaluations and research.

A.1.2 Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

A.2.1 Overview of Purpose and Approach

This data collection contributes to an understanding of the implementation of a long-standing program administered by ACF: the Unaccompanied Refugee Minors Program. The program has been in existence since the 1980s and served upwards of 13,000 participants; however, there is much that is unknown about how states and counties execute the program. This data collection lays the groundwork for future evaluations of the URM Program and identification of promising practices regarding social integration, educational attainment and support, and child welfare.

Data collection will include an online survey of State Refugee Coordinators (SRCs) (Appendix A) in 15 states, an online survey of all 22 URM programs (Appendix B), an online survey to child welfare administrators from programs with private custody arrangements (Appendix C), phone interviews with child welfare administrators from locations whose URM programs have public custody arrangements (Appendix F), and site visits to six communities in which URM programs operate. The six site visits will contribute to an in-depth understanding of URM program operations and local contexts. Data collection throughout the site visits will be guided by interview protocols (Appendices D-H) and focus group guides (Appendices I-J). Additionally, this study will incorporate administrative data provided by ACF and other

Supporting Statements for OMB Clearance

available sources; the collection and use of administrative data does not impose burden on respondents or record-keepers.

By including this variety of respondents, we will ensure that the study will reflect the perspectives of diverse stakeholders and their insights on the program's activities and goals. Further, conducting surveys will provide comprehensive high-level information across all programs, while the site visits will provide a better understanding of nuances in how the programs can differ based on a smaller number of in depth visits.

The data collection is expected to begin in May 2019 and last for approximately four months (through summer 2019), pending OMB approval of this proposed information collection.

A.2.2. Research Questions

As described in A.1.1., there has been little research about how services are provided by URM programs and how they prepare youth for self-sufficiency. To respond to the gaps in knowledge in this area, this study will address the following research questions:
1. What is known about how different URM programs administer benefits and services?
2. What data is currently collected for the URM Program? What does existing data illustrate about the extent that URM youth achieve self-sufficiency? What other data could provide a more complete picture?
3. What are the existing types and packages of services or policy approaches to serving URM youth? What are the characteristics of populations served? What are the issues and challenges associated with implementing and operating alternative approaches?
4. In order to develop a systematic, analytic framework of the URM Program, what would be the optimal evaluation design strategy?

To date, there have been no studies examining the services and characteristics across all URM programs. In addition, while the programs are monitored on a regular basis, monitoring visits do not explore the same questions as the information collection proposed here. This information collection is designed to answer these questions which so far have not been addressed through existing research or information collection.

A.2.3 Study Design

The study will describe how URM programs work to provide URM youth with the skills necessary to enter adulthood and attain self-sufficiency. The study is comprised of two main forms of information collection: surveys and interviews. These two forms of information collection complement each other and contribute to the study in distinct ways. The surveys will provide

systematic information across all the URM programs at a high-level. This enables comparisons across all programs and assessment of variation among programs by geography, size, and other characteristics.

In contrast, the interviews, conducted both over the phone and during site visits, will allow us to take a deeper dive into the nuances of different programs that may not be easily captured in primarily closed response survey questions. In addition, it allows for information collection on variation among sites that we may not be aware of and will not know to ask about in advance. Using these different forms of information collection will also provide diverse perspectives on the program and allow us to engage multiple respondents whose views can contribute to our understanding of the URM Program. Where possible, we will use information from the survey to inform our phone interviews and site visits, to reduce burden on respondents and to prioritize interview questions more appropriately.

The study design will result in a description of services, data collected by programs, and challenges identified by programs, partners, and youth. As this is an exploratory study, the study design does not center on a fully representative sample. However, through the survey and site visits, it will include at least some information from all states with URM programs, and the six sites purposefully selected for visits will include programs with a variety of characteristics. This study's overview of services and program characteristics across states and programs is an important first step in creating the foundation for future research and evaluations.

A.2.4 Universe of Data Collection Efforts

To address its research questions, the study will use multiple data collection instruments. Instruments in the current clearance request include the following:

1. Survey for State Refugee Coordinators (Appendix A)
2. Survey for URM Program Directors (Appendix B)
3. Survey for Private Custody Child Welfare Administrators (Appendix C)
4. Interview Guide for URM Program Managers (Appendix D)
5. Interview Guide for URM Program Staff (Appendix E)
6. Interview Guide for Child Welfare Agency Administrators (Appendix F)
7. Interview Guide for Community Partners [General] (Appendix G)
8. Interview Guide for Community Partners [Education] (Appendix H)
9. Focus Group Guide for URM Youth (Appendix I)
10. Focus Group Guide for URM Foster Families (Appendix J)

Online Surveys:
- Survey for State Refugee Coordinators (Appendix A)
- Survey for URM Program Directors (Appendix B)
- Survey for Private Custody Child Welfare Administrators (Appendix C)

The objective of the online surveys will be to systematically collect program-level information to document state/local policies, as well as program operations and implementation across the country. There will be three surveys: one for State Refugee Coordinators, one for URM program directors, and one for private custody child welfare agency administrators. The surveys will help us identify the types of services offered under the URM program, how services and benefits are administered, how URM programs and child welfare agencies work together, how services are implemented with different sub-populations (e.g., country of origin, method of entry, referral source), types of data collected and systems used by URM programs, types of policies in place regarding URM programs, and expected outcomes of URM program participants. The surveys will also identify any geographic differences in program implementation and any data collection needs.

Interviews via phone and site visits:
- Interview Guide for URM Program Managers (Appendix D)
- Interview Guide for URM Program Staff (Appendix E)
- Interview Guide for Child Welfare Agency Administrators (Appendix F)
- Interview Guide for Community Partners [General] (Appendix G)
- Interview Guide for Community Partners [Education] (Appendix H)

Semi-structured interviews with program staff and local service partners will address services offered to youth served by the URM program; characteristics of the community; the approach to providing the services; the respective roles of the various agencies and organizations involved; how the agencies and organizations integrate services internally and/or collaborate with other organizations; the challenges the youth face and approaches to addressing them; what they see as innovative or interesting practices they employ; what they see as challenges or gaps in services; and how they define and assess service delivery success. In the Interview Guides for URM Program Managers, URM Program Staff, and Community Partners [General and Education] (Appendices D-E and G-H), questions that are repeated in multiple guides are identified.

The research team will conduct phone interviews with child welfare administrators in public custody sites that are not included in the site

Supporting Statements for OMB Clearance

visits. For those with site visits, the research team will interview these individuals in person. The research team will also conduct in-person interviews with child welfare administrators from sites with private custody arrangements for those sites that are selected for site visits. The Interview Guide for Child Welfare Agency Administrators (Appendix F) will be used for both phone and in-person interviews. The phone interviews with child welfare administrators from states with public custody arrangements will allow the research team to delve deeper into these relationships, which are more involved than those in states with private custody arrangements. In these states, the child welfare agency often has oversight of URM cases, includes them in their data systems, and is required to provide them with specific services. During semi-structured interviews, the research team will learn more about the relationships between the child welfare agency and the URM program, the roles of each and methods of collaboration, the services provided to the URM youth through the domestic system, and local child welfare system context and case practice.

Questions may not be equally pertinent to all respondents, so to reduce burden, the research team will review which questions are appropriate before each interview. The Burden Table in Exhibit 2 reflects the maximum estimated burden. However, the actual burden may be less if the research team determines some questions are not suitable for a given respondent. For example, the interviewer will prioritize certain questions in the Interview Guide for Community Partners [General] (Appendix G) for a group home that specifically serves URM youth, and different questions for a mental health provider who serves a wider range of youth and may not clearly distinguish between URM and other refugee youth. For the Interview Guide for Child Welfare Agency Administrators (Appendix F), we have identified specific sections to prioritize for phone interviews, as we anticipate that it will be more difficult to cover all sections over the phone. We have also provided guidance on groups of youth with similar characteristics to ask about if respondents are not familiar with the URM Program. The research team will not change the substance of questions, but instead will identify the questions and language selection in the existing guides to be most appropriate for the respondent and exclude irrelevant questions. Guidance to interviewers is provided in the interview guides themselves.

Focus Groups:
- Focus Group Guide for URM Youth (Appendix I)
- Focus Group Guide for URM Foster Families (Appendix J)

Two focus groups will also be conducted during the site visits: one with URM youth aged 16 and over who entered the URM program within seven to 24 months of the focus group, and one with URM program foster parents. Focus group guides will include fewer questions than the staff interview protocols, as focus groups are meant to encourage free-flowing, interactive discussions among participants, and not just responses to the facilitator's questions. We will also have focus group participants complete a brief form asking for basic demographic information (which will not include names) so we can summarize the participants' characteristics.

These data collection instruments will cover topics not available from existing data sources. Other data will be used for the study that does not impose burden on the public, and includes the following:

- ORR-collected data from the ORR-3 and ORR-4 forms or monitoring activities, including program size, program tenure, information on placement options, the relative proportion of refugees and Unaccompanied Alien Children (UACs), and information on the numbers and national origins of recently resettled URM youth;
- State plans collected by ORR, which may provide background information about states' plans to serve the URM population; and
- Program abstracts and information from the Resettlement Agencies.

A.2.5 Instrument Item-by-Item Justification

Exhibit 1 outlines the justification for each data collection instrument.

Exhibit 1: Instrument Item-by-Item Justification

Data Collection Instrument(s)	Respondents, Content, and Reason for Inclusion
Activity: Survey	
1. Survey of State Refugee Coordinators (Appendix A)	Respondents: State Refugee Coordinators for 15 states with URM programs. Content: • Program administration • Strengths and needs of populations served • Promising approaches • Outcomes and evaluation • Data • Policy guidance Used for: • Special topic reports • Final Report

		Addresses research questions: 1, 2, 3
2.	Survey for URM Program Directors (Appendix B)	Respondents: URM Program Directors from 22 URM programs. Content: • Program administration • Services provided • Strengths and needs of populations served • Promising approaches • Challenges • Outcomes and evaluation • Data • Policy guidance Used for: • Special topic reports • Final Report Addresses research questions: 1, 2, 3
3.	Survey for Private Custody Child Welfare Administrators (Appendix C)	Respondents: Child Welfare administrators in sites where URM youth are in private custody arrangements. Given the variety of child welfare system administration (e.g., state vs. county administered systems), the role and level of these respondents may vary across programs and states. Content: • Roles and responsibilities for providing services to URM youth • Communication/relationship with URM program • Monitoring practices • Policy guidance Used for: • Special topic reports • Final Report Addresses research questions: 2, 3
Activity: Site Visit Interviews		
4.	Interview Guide for URM Program Managers (Appendix D)	Respondents: URM program directors Content: • Characteristics of URM youth served • Organization and program background • Local context

	• Arrivals and placements • Services • Partnerships • Schools • Youth well-being • Promising practices and challenges • Outcomes • Data Used for: • Special topic reports • Final Report Addresses research questions: 1, 2, 3, 4
5. Interview Guide for URM Program Staff (Appendix E)	Respondents: URM data managers, caseworkers, and other staff. Content: • Characteristics of URM youth served • Organization and program background • Local context • Arrivals and placements • Services • Partnerships • Schools • Youth well-being • Promising practices and challenges • Outcomes • Data Used for: • Special topic reports • Final Report Addresses research questions: 1, 2, 3, 4
6. Interview Guide for Child Welfare Agency Administrators (Appendix F)	Respondents: Child welfare agency administrator and/or staff who work with each URM program. This interview guide will also be used for phone interviews with child welfare administrators in sites with public custody arrangements that are not included in the site visits. Content: • Child welfare system context and policy approaches • Coordination with URM program • Custody and dependency

	• Placements and services provided • Strengths and needs of populations served • Promising practices, outcomes, and evaluation • Challenges • Data Used for: • Special topic reports • Final Report Addresses research questions: 1, 2, 3, 4
7. Interview Guide for Community Partners [General] (Appendix G)	Respondents: this guide can be tailored for leadership and line staff from a variety of local organizations, including health care and mental health care providers, legal aid organizations, and faith-based groups serving the URM population. Content: • Characteristics of URM youth served • Services provided to URM youth • Partnerships • Promising practices and challenges in serving URM youth • Context on local communities and service landscape • Outcomes • Data and evaluation Used for: • Special topic reports • Final Report Addresses research questions: 1, 2, 3, 4
8. Interview Guide for Community Partners [Education] (Appendix H)	Respondents: Leadership and line staff from local partners in the field of education, including school administrators and counselors, and staff from organizations providing English language education and support. Content: • Educational services provided to URM youth • Culturally- and integration-related services • Promising practices and challenges • Context on local communities • Outcomes • Data

	Used for: • Special topic reports • Final Report Addresses research questions: 1, 2, 3, 4
Activity: Site Visit Focus Groups	
9. Focus Group Guide for URM Youth (Appendix I)	Respondents: current and former URM program participants. Content: • Arrival and initial services • Living situations • Services • Adjustment to the U.S. • Satisfaction Used for: • Special topic reports • Final Report Addresses research questions: 1, 3
10. Focus Group Guide for URM Foster Families (Appendix J)	Respondents: foster parents of current and former URM program participants. Content: • Initial interactions with the URM program • Placement • Supports • Services for youth and youth well-being • Satisfaction Used for: • Special topic reports • Final Report Addresses research questions: 1, 3

A3. Improved Information Technology to Reduce Burden

The online surveys will be fielded using a secure online platform, SurveyGizmo, which will help ease the burden of participation.[1] The platform allows individuals to stop and restart the survey where they left off, as needed. Each respondent receives a unique link to the survey which allows them to share the link with others on their team. Each survey will incorporate skip patterns, where appropriate, to avoid asking questions that are contingent on answers to previous questions.

The information from site visits will be collected through semi-structured discussions that are not conducive to information technology. We will audio-record all interviews and focus groups, with consent of the respondents.

A4. Efforts to Identify Duplication

Data collection activities will collect information that is not currently available through other identified sources. In addition, the survey, interview guides, and focus group guides have been developed using guidance from consultations with URM Program stakeholders in order to maximize the content the study team is able to gather through each instrument, and avoid asking the same information of multiple sources. To the extent possible, we will review information available from existing data sources, such as administrative data and publications, to avoid asking respondents questions we can find answers to elsewhere. There is no other existing or ongoing data collection of this scale of the URM Program.

A5. Involvement of Small Organizations

The primary organizations involved in this study are state refugee agencies, local URM programs, and community-based organizations that provide services to unaccompanied refugee minors, some of which are small organizations. The research team will minimize burden for all entities, including those that could be considered to be small organizations, by requesting only the information required to achieve the study's objectives; providing clear guidance on survey and interview procedures; and conducting interviews on-site and via telephone at times convenient for

---

[1] Survey Gizmo contains several security measures relevant for this survey, including secure links to the survey and 256-bit data encryption within the application and for all backups. In addition, Child Trends does not collect information such as IP addresses or geo-location data, and they limit access to the Survey Gizmo account to the account administrator and relevant individuals within the department. Child Trends uses these measures when collecting personally identifiable information to ensure the data collected are secure.

Supporting Statements for OMB Clearance

respondents. There should be no adverse impact for any organizations participating in the study.

A6. Consequences of Less Frequent Data Collection

All data to be collected associated with this specific burden request are one-time in nature. Not collecting information as proposed would limit the government's ability to identify and document valuable information about the strategies URM programs use to provide services to URM youth so that they develop skills to achieve self-sufficiency.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

A.8.1 Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on September 17, 2018, Volume 83, Number 180, page 46956, and provided a sixty-day period for public comment. A copy of this notice is attached as Attachment A**.** During the notice and comment period, one set of comments was received, which is attached as Attachment B.

A.8.2 Consultation with Experts Outside of the Study

The study team conducted in-person and phone consultations with the national resettlement agencies, State Refugee Coordinators, local program directors, and researchers who have a range of expertise in URM Program operations, policy context, the research landscape, and other URM- and refugee-related topics. The recommendations received from experts helped shape the final data collection instruments. The study team tailored these conversations to the specific area of expertise and local context of each respondent; as a result, the study team engaged fewer than nine people for consultation on a given topic.

In addition to the consultations with experts outside the study, our consultations included experts within the federal agency that authorized the study (the Administration for Children and Families – most notably, Anne Mullooly and other staff members from the Office of Refugee Resettlement), as well as Lyn Morland, the expert consultant who is part of the contracted study team.

Exhibit 2: List of Stakeholders Consulted

Name	Affiliation	Contact
Dawnya Underwood	LIRS	dunderwood@lirs.org
Katie Kuennen	USCCB	kkuennen@usccb.org
Tiara Barnwell	USCCB	tbarnwell@usccb.org
Al Horn	Michigan Office of Refugee Services	horna@michigan.gov
Dona Abbott	Bethany Christian Services (Grand Rapids, MI)	dabbott@bethany.org
Molly Daggett	Washington Office of Refugee Services	daggem@dshs.wa.gov
Karen Danz	Lutheran Christian Services Northwest	kdanz@lcsnw.org
Elzbieta Gozdziak	Georgetown University	emg27@georgetown.edu
Tom Crea	Boston College	creat@bc.edu
Charles Shipman	Arizona Immigrant and Refugee Services	cshipman@azdes.gov
Kit Taintor	Colorado Department of Human Services	kit.taintor@state.co.us
Jennifer Berenson	Catholic Family Center (Rochester, NY)	jberenson@cfcrochester.org

A9. Incentives for Respondents

We propose to offer each focus group participant a $30 gift card as a thank you and to account for incidental expenses related to participation in the data collection.

Some respondents may incur direct costs for attending the focus groups, such as transportation to the focus group, which may not be at a location that is convenient for all potential participants, or rearranging their work and/or school schedules to accommodate the focus group. Thus, $30 is a reasonable amount to offset the inconvenience and cost that might otherwise deter participation in the information collection activities.

The goal of this focus group data collection is to capture a wide variety of URM program participants' experiences. These data are not intended to be representative in a statistical sense; findings will not allow us to infer the prevalence of themes in the population of Unaccompanied Refugee Minors.

However, by striving to include participants with a range of salient demographic characteristics, we aim to capture a variety of URM experiences with program services. Future research with more representative methods—such as surveys—can then be used to examine the relative frequency of these experiences in the full population. Without offsetting the direct costs incurred by respondents attending the focus groups, the research team increases the risk of reaching only those individuals able to overcome financial barriers to attend on their own. Individuals who may be less able to attend without support to offset their costs may have distinct perspectives on and experiences with the URM Program that would otherwise not be captured in the focus group discussions. This would harm the quality of insights drawn from the study and its potential to meaningfully inform future research.

Research has shown incentives' effectiveness in encouraging study participation among underrepresented populations, including minority groups, individuals with low levels of education, and low-income households.[2] URM program participants and families likely have one or more of these characteristics, and securing participation of refugees with a range of demographic backgrounds is key to the utility of the data collection. Directly relevant to the population in this study, previous OPRE work examining refugees' experiences with public benefits (the TANF RCA Study, OMB control number 0970-0469), demonstrated that $30 gift cards successfully supported adult refugees' participation in focus groups in eight site visits across different geographic contexts. For the current study, we anticipate that $30 will serve as a reasonable amount that is high enough to support participation, but is not so high as to appear coercive for potential URM youth or foster parent focus group participants.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. In the introductory emails that will be sent to URM program managers, SRCs, and private child welfare agencies (Appendices K-M), survey respondents will be informed that program-level responses will be shared with ACF and that a potential risk to participation is a loss in privacy.

When conducting focus groups, facilitators will administer consent/assent verbally to minimize the need for paper forms containing records of

---

[2] Singer, Eleanor and Richard A. Kulka. (2002). "Paying Respondents for Survey Participation." Studies of Welfare Populations: Data collection and Research Issues. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press.

attendance. Facilitators will not record participant names in focus group notes, and raw notes will not be shared outside of the research teams. Reports from this project, including internal site visit summaries provided to ACF by the research time will not contain any names.

As specified in the contract, the research team will comply with all Federal and Departmental regulations to protect private information. The research team has developed a Data Security Plan that outlines all protections of respondents' personally identifiable information. The Plan will include information on steps to minimize to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information. The research team shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the requirements in the Data Safety and Monitoring Plan.

The research team will comply with and implement Federal Information Processing Act (FISMA) required security controls for the FIPS-199 Low/Moderate classification level to protect sensitive information during storage and transmission. The research team shall: ensure that this standard is incorporated into the research team's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.

All data will be stored on a secure FedRamp-certified server which complies with FISMA and NIST SP800-37 Revisions 1. Only research team members who require access to the data for analysis will have access to the server.

The project team received approval from the Child Trends' Institutional Review Board in November 2018. In approving all research protocols and focus group facilitation procedures, the Child Trends IRB determined that participation in the study poses no more than minimal risk to participants.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Supporting Statements for OMB Clearance

The project team intends to apply for a Certificate of Confidentiality from the National Institutes of Health. Once a Certificate of Confidentiality is granted, the researchers with this Certificate may not disclose or use information or documents that may identify respondents in any federal, state, or local civil, criminal, administrative, legislative, or other action, suit, or proceeding, or be used as evidence, for example, if there is a court subpoena, unless respondents have consented for this use. Information or documents protected by this Certificate cannot be disclosed to anyone else who is not connected with the research except, if there is a federal, state, or local law that requires disclosure (such as to report child abuse). The Certificate of Confidentiality will not be used to prevent disclosure as required by federal, state, or local law of child abuse and neglect, or harm to self or others.

A11. Sensitive Questions

The URM youth focus group discussion guide includes items addressing their pathway into the program, their receipt of health and mental health services, interactions with foster families, challenges they face, and other services they receive. While not asked about, the experiences that led URM youth to become refugees may come up in discussion. Some respondents may consider these somewhat personal questions to be sensitive. Some respondents may also consider questions about their experiences since arriving the U.S. to be sensitive.

Including these items is necessary to understand participants' experiences accessing services through the URM programs, and how services for URM youth may be improved. The research team will take several steps to minimize the discomfort that such questions may pose. Participants will have the topics the focus group will cover explained to them in advance. Focus group staff will inform respondents that participation is voluntary and they may refuse to answer individual items. Study participants will also be reminded that the study team will keep their responses private, to encourage their candid responses. Further, the research staff will encourage the participants to not discuss other participants' responses outside of the group; however, the research team cannot guarantee that focus group participants will abide by this, and will explain that fact to participants before beginning the discussion. When coordinating the site visits, the research team will arrange for at least one caseworker or staff person from the URM program be present nearby (though not within earshot of the group discussion) and available to support or debrief with any youth who desire to do so. These caseworkers are adept at handling situations where URM youth face emotional strain.

A12. Estimation of Information Collection Burden

A.12.1 Burden Hours

Exhibit 2 presents this data collection's reporting burden on the respondents to the survey instruments and participants in site visit interviews and focus group, as well as the total cost. All data collection will be completed within a one-year period, so the annualized burden estimate is equal to the total burden estimate. The estimated burden is 410 hours. See below for estimated burdens for each instrument.

Exhibit 2: Total Burden Requested Under this Information Collection

Instrument	Total/ Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
1. Survey of State Refugee Coordinators (Appendix A)	38	1	0.67	25	$47.70	$1,214.44
2. Survey of URM Program Directors (Appendix B)	55	1	1	55	$47.70	$2,623.50
3. Survey for Private Custody Child Welfare Administrators (Appendix C)	21	1	0.67	14	$47.70	$667.80
4. Interviews with URM Program Managers (Appendix D)	9	1	1.5	14	$47.70	$667.80
5. Interviews with URM Program Staff (Appendix E)	36	1	1.5	54	$31.77	$1,715.58
6. Interviews with Child Welfare Agency Administrators (Appendix F)	26	1	1	26	$31.77	$826.02
7. Interviews with Community Partners	48	1	1	48	$31.77	$1,524.96

[General] (Appendix G)						
8. Interviews with Community Partners [Education] (Appendix H)	12	1	1	12	$31.77	$381.24
9. Focus Groups with URM Youth (Appendix I)	54	1	1.5	81	$10.15	$822.15
10. Focus Groups with URM Foster Families (Appendix J)	54	1	1.5	81	$33.40	$2,705.40
Estimated Annual Burden Total				**410**		**$13,148.89**

A.12.2 Total Annual Cost

The total cost burden to respondents is based on the estimated burden hours and the assumed mean hourly wage rate for respondents. The mean average hourly wage for each respondent group was based on information from the Bureau of Labor Statistics or the federal minimum wage. The average hourly wage for each group was calculated using the following categories:

- Social and Community Service Manager Occupations (SOC 11-9151): wage rate of $34.07 plus a 40 percent adjustment to account for benefits, or $47.70 per hour.
- Social and Community Service Occupations (SOC 11-0000): wage rate of $22.69 plus a 40 percent adjustment to account for benefits, or $31.77 per hour.
- Focus groups with foster parents: mean wage rate for all occupations (SOC 00-0000) of $23.86 plus a 40 percent adjustment to account for benefits, or $33.40.
- Focus groups with URM youth: youth minimum wage of $7.25.

A13. Cost Burden to Respondents or Record Keepers

There are no additional recordkeeping or reporting costs for respondents for this data collection effort.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be $215,383. This amount includes costs for new data collection activities under this request, including development of data collection materials, fielding the survey, and field work.

A15. Change in Burden

This is a new information collection.

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Data Collection or Publication Activity	Timing*
Surveys	Summer to Fall 2019
Phone Interviews with Child Welfare Administrators	Summer to Fall 2019
Site Visit Interviews and Focus Groups	Fall 2019 to Winter 2020
Special Topic Report 1	Summer to Fall 2020
Special Topic Report 2	Fall 2020 to Winter 2021
Final Report	March 2021

*Exact timing is dependent on OMB approval of proposed information collection.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.