Refugee Support Services (RSS) and RSS Set Aside Sub-Grantee List

OMB Information Collection Request 0970 - NEW

Supporting Statement Part A -Justification

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SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for an information collection, requesting Refugee Support Services (RSS) grantees and RSS Set Aside grantees to provide the agency name, city, state, phone number, and funding amount for each contracted sub-grantee.

Without having this information regarding RSS sub-grantees, ORR does not know whether an agency is receiving ORR funds or not. This makes it difficult to ensure communications with, provide access to targeted assistance for, and keep abreast of the activities of all ORR-funded refugee service providers.

This information collection is related to and funded by Refugee Support Services, is authorized by the Refugee Act of 1980 [Immigration and Nationality Act, Title IV, Chapter 2 Section 412 (e)] and 45 CFR §400.28 and is being conducted by the Division of Refugee Assistance.

2. Purpose and Use of the Information Collection

In order to provide clear communication and targeted assistance, ORR will require information on RSS and RSS Set Aside sub-grantees. This form will be sent to State Refugee Coordinators once a year.

Each RSS and RSS Set Aside grantee will complete a chart indicating the agency name, city, state, funding amount, and phone number of each contracted RSS and RSS Set Aside sub-grantee.

ACF will use the information collected to improve communication with and keep abreast of activities at all refugee service providers receiving ORR funds. Improved communication will allow ACF to provide access to targeted assistance to these providers, as well.

3. Use of Improved Information Technology and Burden Reduction

RSS grantees will first complete the RSS and RSS Set Aside Sub-Grantee List Form in Excel and submit by email. The following fiscal year, it is planned to be included within the Refugee Arrivals Data System database.

4. Efforts to Identify Duplication and Use of Similar Information

The information collected here was reviewed against other ORR forms and reports to ensure that this information is not collected elsewhere.

5. Impact on Small Businesses or Other Small Entities

We do not anticipate the involvement of small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

RSS sub-grantees change often. Without an annual requirement, ORR will have no assurance of its data's accuracy, and therefore its ability to communicate with, provide targeted assistance to, and keep abreast of all ORR-funded refugee service providers.

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

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

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

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 March 12, 2020, Volume 85, Number 49, page 14489, and provided a sixty-day period for public comment. During the notice and comment period, 1 comment was received, which is attached. As the purpose of this information collection is for internal purposes, the suggestion to make the information public will not be considered at this time. Numerous requests for the form and instructions were received in response to the FRN, including on behalf of the national association of state refugee coordinators (State Coordinators of Refugee Resettlement, or SCORR). All requests for materials were fulfilled.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts for respondents are proposed for this information collection.

10. Assurance of Confidentiality Provided to Respondents

This information collection does not collect any personally identifiable or sensitive information. Information collected will be kept private and respondents will be informed of the purpose of the information collection.

11. Justification for Sensitive Questions

There are no sensitive questions in this data collection.

12. Estimates of Annualized Burden Hours and Costs

Instrument	Total Number of Respondents	¹ Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Annual Cost
RSS and RSS Set Aside Sub- grantee List	56	3	2	336	112	\$38.8	\$4,345.60
Total					112		\$13,037

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2018, which is \$19.40 per hour for state employees. To account for fringe benefits and overhead the rate was multiplied by two which is \$38.80. The annual cost to respondents is estimated to be \$4,345.60. https://www.bls.gov/oes/current/oes211093.htm

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

There are no additional costs to respondents or record keepers.

14. Annualized Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$1,863 over the three year period, or \$621 annually. This is based on approximately one hour each year for nine regional representatives, six hours for the development of the form, and an additional two hours each year for compilation of the data for a total of 39 hours over three years. This will all be done by GS-13 level staff who on average make \$47.77 per hour.

15. Explanation for Program Changes or Adjustments

This is a new information collection.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans to publish this data.

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

¹ Total responses over a three year period.

All instruments will display the expiration date for OMB approval.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.