

# **RSS Set-Aside Sub-Grantees**

**Formative Data Collections for Program Support**

**0970 - 0531**

## **Supporting Statement**

### **Part A - Justification**

**February 2020**

Submitted By:  
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Administration for Children and Families  
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## **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 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.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of targeted assistance and workflows related to program implementation or the development or refinement of program and grantee processes, and the development and refinement of recordkeeping and communication systems.

Without having this information regarding RSS subgrantees, 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.

### ***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**

### ***Overview of Purpose and Approach***

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.

### ***Universe of Data Collection Efforts***

States and Replacement Designees, a total of 56 entities, will complete the RSS and RSS Set Aside Sub-Grantee List Form.

### **A3. Improved Information Technology to Reduce Burden**

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

### **A4. Efforts to Identify Duplication**

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

### **A5. Involvement of Small Organizations**

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

### **A6. Consequences of Less Frequent Data Collection**

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.

### **A7. Special Circumstances**

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

### **A8. Federal Register Notice and Consultation**

#### ***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 the overarching generic clearance for formative information collection. This notice was published on October 11, 2017, Volume 82, Number 195, page 47212, and provided a sixty-day period for public comment. A subsequent notice, updated with more specific information, was published on June 18, 2019, Volume 84, Number 117, page 28307, and provided a thirty-day period for public comment. During the notice and comment periods, no substantive comments were received

#### ***Consultation with Experts Outside of the Study***

Two state refugee coordinators were consulted in the spring of 2019 regarding this request and each felt that it was reasonable and not too burdensome.

### **A9. Incentives for Respondents**

No incentives for respondents are proposed for this information collection.

### **A10. Privacy of 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.

### **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

### **A12. Estimation of Information Collection Burden**

#### **Total Burden Requested Under this Information Collection**

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

#### **Total Annual Cost**

The annual burden is \$13,037 or \$232.80 per respondent. 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 estimate of annualized cost to respondents for hour burden is \$38.80 times 6 hours or \$232.80.

<https://www.bls.gov/oes/current/oes211093.htm>

### **A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

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<sup>1</sup> Total responses over a three year period.

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be \$1,863. 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.

**A15. Change in Burden**

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

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

As soon as the form is approved for distribution, it will be sent to the respondents. The following year ORR will seek responses on November 30<sup>th</sup>.

**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.