Refugee Assistance Program Estimates: CMA – ORR-1

OMB Information Collection Request 0970 - 0030

Supporting Statement Part A -Justification

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Submitted By: Office of Refugee Resettlement Administration for Children and Families U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Refugee Cash and Medical Assistance (CMA) program, implemented by the Office of Refugee Resettlement (ORR) in the Administration for Children and Families, Department of Health and Human Services (HHS), is a reimbursement program for costs incurred by States in providing benefits and services to refugees, Amerasians, Cuban and Haitian entrants, asylees, Afghans and Iraqis with Special Immigrant Visas, and victims of a severe form of trafficking. The types of costs that are reimbursed are: (1) cash assistance, (2) medical assistance, (3) medical screening, (4) administrative costs, and (5) services for unaccompanied refugee minors. Reimbursement is provided through mandatory grant awards. Currently, reimbursement is provided for benefits and services provided during the first eight months after arrival of an eligible recipient. The number of months of assistance for which reimbursement is provided is determined by the available appropriation.

The ORR-1, Cash and Medical Assistance (CMA) Program Estimates, is the State application for quarterly grant awards under this program. ORR regulations at 45 CFR 400.11(b) specify that a State must submit yearly estimates of reimbursable costs, identified as cash assistance, medical assistance, related administrative costs, and services to unaccompanied minors, in order to receive grants under this program. The application for quarterly CMA grants is due 45 days prior to the start of the fiscal year.

The ORR-1, CMA Program Estimates, fulfills three important functions. First, as noted above, it is the annual application for this program, as required by ORR regulations. Second, since CMA reimbursement is available only to the extent that appropriations are available, it is essential that ORR be able to project accurately what the costs of the program will be for each fiscal year. The estimates submitted by States in the ORR-1 provide one source of information on expected costs and contribute to ORR's determination each year of the number of months of assistance that can be reimbursed. Finally, the estimates contribute to effective monitoring by providing a fiscal baseline for desk and on-site monitoring of States.

2. Purpose and Use of the Information Collection

As noted above, the information collected through the ORR-1 application will be used for three purposes: (1) to serve as the annual application for the Cash and Medical Assistance program, as required by the ORR regulation; (b) to provide estimated costs for the subsequent year of the program; and (3) to provide baseline information for fiscal monitoring of States.

These data will be used internally within ORR, HHS, and OMB only, for the review and justification of Cash and Medical Assistance program budgets.

3. Use of Improved Information Technology and Burden Reduction

This data collection form will be completed and submitted through ACF's online data collection system (Grant Solutions/OLDC). States already use the online data collection system (Grant Solutions/OLDC) to report financial data for CMA grants.

4. Efforts to Identify Duplication and Use of Similar Information

No similar information collection exists that could be substituted as an application form for the CMA program. In addition, there is no other information collection form for States' annual estimates of what their costs will be.

5. Impact on Small Businesses or Other Small Entities

The information to be collected is the minimum needed to meet the requirements of an application form that will provide relevant cost projections for the CMA program. There will be no impact on small businesses.

6. Consequences of Collecting the Information Less Frequently

The ORR regulations at 45 CFR 400.11(b) mandate that States submit an application form that provides cost estimates annually. This information collection form is the annual application form for quarterly awards under the CMA program. Less frequent collection would not fulfill the regulatory requirement of an annual application.

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

There are no special circumstances pertaining to this form. Respondents will report annually. Respondents have more than 30 days to prepare responses, since the form may be submitted at any time up to 45 days prior to the beginning of the next fiscal year. The data collection form will be available continuously to grantees thus allowing ample time to grantees for collecting the data and applying for the next year's grant. Respondents submit form electronically through ORR's online data collection system (Grant Solutions/OLDC). Respondents do not need to retain records for more than three years. There is no requirement for confidential information. The data collection is not a statistical survey.

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

December 14, 2020, Volume 85, Number 240, page 80790, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

There will be no payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

Since the respondents will be State agencies, rather than individuals, and since the reporting will be on cost estimates for reimbursement by federal grant funds, there will no assurance of confidentiality; and no Privacy Act System of Records will be established.

11. Justification for Sensitive Questions

There are no sensitive questions in this data collection. The collection is an application that requires grantee cost estimates. No personal identification numbers are required.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ORR-1, CMA Program Estimates	57	1	0.6	34	\$39.16	\$1,331.44
Estimated Annual Burden Total:				34	Estimated Annual Cost Total:	\$1,331.44

There will be approximately 57 respondents. The respondents consist of the State agencies, Replacement Designees, and Wilson Fish agencies that implement refugee resettlement programs. When a State agency withdraws from the refugee resettlement program, the director of ORR may select a State Replacement Designee to implement the State-wide refugee resettlement program. The State Replacement Designee may be a non-profit organization.

ORR is requesting 1 year of approval to allow time for consideration of changes to the ORR-1, CMA Program Estimates. The total annual hour burden for all participating States is 34 hours.

The total annualized cost of the hourly burden is 34 hours times \$39.16 or \$1,331.44. The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for

Social and Human Services Assistants [21-1093] working in state government and wage data from May 2019, which is \$19.58 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$39.16. The estimate of annualized cost to respondents for the hourly burden is \$39.16 times 34 hours or \$1,331.44. (https://www.bls.gov/oes/current/oes_stru.htm)

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

It is not anticipated that there will be any Other Annual Cost Burden to Respondents and Record Keepers. The actual cost data on which the estimates in the ORR-1 will be based are already collected and reported on the ORR-2 Federal Financial Report.

14. Annualized Cost to the Federal Government

The total annualized cost to the Federal Government for review of the ORR-1 is \$1,547, which reflects 34 review hours at \$45.50 per hour. The cost to the Federal Government was calculated using the Bureau of Labor Statistics (BLS) job code for Management Analysts [13-1111] working in federal government and wage data from May 2019. (https://www.bls.gov/oes/current/oes_stru.htm)

15. Explanation for Program Changes or Adjustments

There are no changes.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans to publish these data. These data are for internal use only as an application for grant awards. These data will be entered into an Excel spreadsheet and tracked by program component and total estimated cost. Refugee Resettlement Program Specialists will have access to the forms as submitted and to the program-wide spreadsheet to assist them in financial monitoring of the states for which they are project officers.

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

The OMB Expiration Date will be displayed on the information collection.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.