

RSS and RSS Set-Aside Sub-Grantee List

**OMB Information Collection Request
0970 - 0556**

**Supporting Statement Part A - Justification
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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 Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval of an extension with minor updates for an information collection, requesting Refugee Support Services (RSS) grantees and RSS Set-Aside grantees to provide the agency name, city, state, website, and funding amount for each contracted sub-grantee. Most RSS Grantees and RSS Set-Aside grantees sub-contract with sub-grantees to provide direct services to clients. Information about sub-grantees is necessary for the Office of Refugee Resettlement (ORR) to identify which local agencies are receiving ORR funding through RSS and RSS Set-Aside funding as well as ORR's numerous discretionary grants which are funded directly by ORR.

The current form has been revised to request a website instead of a phone number. Some clarifications have also been added to the instructions. We would also like to share information other than the funding amount with federal partners who may make the information public, so we have revised this supporting statement and the instructions to specify this. Changes made to the instructions and form are in response to consultations held with State Refugee Coordinators (SRCs).

This information collection will provide ORR the data it needs for national resource mapping at the local level. In other words, it will assist ORR in identifying agencies which receive ORR funding through numerous ORR sources. Local agencies may receive funding through ORR directly, through non-governmental organizations (NGOs) that receive ORR funding and sub-grant out the work, and through states or replacement designees. ORR currently collects this information for its discretionary grants but just began collecting this information for formula RSS and RSS Set-Aside grantees when this form was initially approved in October 2020.

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 ORR, Division of Refugee Assistance.

2. Purpose and Use of the Information Collection

Once a year, each RSS and RSS Set-Aside grantee will complete a chart indicating the agency name, city, state, funding amount, and website of each contracted RSS and RSS Set-Aside sub-grantee. The main purpose of the information collected through this report is to provide ORR with a complete picture of the availability of all ORR resources and to assist newly arrived refugees identify local service providers. The information collected is and will continue to be used for national resource mapping pertaining to ORR funding at the local level. ORR also uses the information to identify gaps or target areas of need. For example, ORR will be able to use this information to work with its partner at Department of State, Bureau of Population, Refugees, and Migration (PRM), to assist with appropriate placement planning. In accordance with the current administration's policy to expand the number refugees resettled into the U.S. in the

coming years, PRM is looking to approve new locations for refugee resettlement agencies. If PRM has identified a new location where refugees are beginning to resettle, ORR can ensure that through its numerous funding streams, services can reach these clients.

Additionally, each year the Department of Labor requests information from ORR on local agencies providing employment services. While ORR currently provides this list for Match Grant sub-grantees that receive ORR funding, ORR cannot provide this information for its formula RSS service providers without this sub-grantee data.

3. Use of Improved Information Technology and Burden Reduction

RSS grantees will complete the RSS and RSS Set-Aside Sub-Grantee List Form in the ORR Refugee Program's database system which is called: Refugee Arrivals Data System (RADS).

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

SRCs will be required to provide this information once a year. RSS sub-grantees change often. Without an annual requirement, ORR will have no assurance of its data's accuracy, and therefore its ability to have a current national resource map.

As this information will be housed within ORR's database system, after the initial information is provided, only annual updates will be required to already existing information on the sub-grantees.

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 June 3, 2021, Volume 86, Number 105, page 29788, and provided a sixty-day period for public comment. Two requests for the form and instructions were received in response to the FRN. All requests for materials were fulfilled.

During the notice and comment period, 2 comments were received. One comment did not have any suggested changes to the form or instructions. The second comment listed several concerns. This comment was from an individual who is on the executive board of the State Coordinators of Refugee Resettlement, but *not* written on their behalf.

First, the comment stated that ORR already has access to this data from the ORR-6 Performance Report. This is not accurate. The ORR-6 does not require a complete list of sub-grantees for RSS and RSS Set-Aside funding. Hence, the ORR-6 does not capture the information needed for a national resource map.

Second it states that the administrative burden would be too high. This is a basic information collection which requires minimal data on sub-grantees which should be easily accessible for those administering those grants. Additionally, with the use of ORR's database system, information will only have to be updated after the initial data collection of sub-grantees. The list of sub-grantees will be housed within the database and SRCs will only need to remove or add any new/old sub-grantees and update financial information.

Third, there is confusion regarding the term used "improved communication" within the Federal Register Notice (FRN). This was not meant to indicate that ORR would directly communicate with sub-grantees. The "improved communication" that is mentioned is in regard to sharing this information with other federal partners and sharing this information publicly so that clients can readily access local service provider information. SRCs play a vital role in their states by ensuring that clients can access services and ORR will only use this list to support their role, not supplant it. Language in the second FRN has been changed to address this issue.

Fourth, there were stated concerns regarding the use of the data. This information collection will be housed in the same database that all other ORR state funded program data is housed and will follow the same rules and regulations regarding data use, data storage, and data accountability.

Fifth, there were concerns about the impact of this data collection on the well-being of clients. We are not collecting client-level data. The intent of this data collection and making this data collection public is to benefit clients to allow them easier access of information on where to receive local services. Those agencies who receive this funding are public facing in their communities and therefore this would not pose any additional risk to clients or create additional concerns to clients wishing to access these services.

Finally, there were fears regarding privacy and safety concerns for the agencies by sharing the list of these agencies publicly. These agencies are public facing in their communities and are not providing services that would require them to remain private (like a domestic violence shelter).

After careful consideration of all six of these concerns, ORR has chosen not to make any changes to this form. However, given the extensive comment provided, ORR consulted with several additional SRCs, including those from some of our largest states. None of these SRCs shared the concerns listed in the comment and expressed that they had no concerns regarding this data collection.

Additional Consultation

In addition to feedback in response to the first Federal Register Notice, ORR consulted SRCs who had stated they were worried that phone numbers would not remain current, ORR would use phone to directly contact sub-grantees and that agency staff privacy may be in jeopardy by putting the agency phone number on a public web-site. No other concerns were identified. Hence, phone number has been changed to website. This change will still allow ORR to complete the national resource mapping and to identify ORR's various funding streams at the local level.

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. This information will be shared with other federal partners and may be made public.

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	\$39.06	\$4,374.72
Total					112		\$4,374.72

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 2020, which is \$19.53 per hour for state employees. To account for fringe benefits and overhead the rate was multiplied by two which is \$39.06. The annual cost to respondents is estimated to be \$4,374.72.

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

¹ Total responses over a three-year period.

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 \$1,938 over the three-year period, or \$969 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 \$49.68 per hour.

15. Explanation for Program Changes or Adjustments

There are no changes to the estimated time per response or overall estimated burden. This request does, however, include two changes from the previously approved form. First is replacing the field for phone number with the agency website. This is due to concerns voiced by SRCs who were worried that phone numbers would not remain current, agency staff privacy may be in jeopardy by putting the agency phone number on a public web-site and that ORR would use this information to directly contact sub-grantees. Since the desire is to have as current information as possible and there is not a desire to undermine the role of the SRCs, this has been changed to website. This will still allow for the national resource mapping and to identify the various funding streams of ORR at the local level. Additionally, we are requesting that this information be allowed to be publicly available. This will allow ORR to assist SRCs and clients by creating a national resource map that may be accessed externally by clients or other service providers in their states.

16. Plans for Tabulation and Publication and Project Time Schedule

Currently, the plan is to share information (other than the funding amount) with our federal partners at Department of Labor's One Stop Career Center program upon their request which is typically in the spring each year. We would share agency name, city, state, and website. We would only share the Refugee Social Services sub-grantees and not our RSS Set-Aside programs who do not provide employment services. Additionally, as refugee arrivals increase, ORR may share this information with PRM to ensure that refugees resettled through their Remote Placement Program are aware of services in their area, if relevant. There have been discussions of making the national resource map of all ORR services available on ORR's public facing website, but definitive plans have not been made.

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

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.

