

Unaccompanied Refugee Minors Program Application, and Withdrawal of Application or Declination of Placement Form

**OMB Information Collection Request
0970 - NEW**

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 Act of 1980, Pub. L. No. 96-212, 8 U.S.C. 1522, amended the Immigration and Nationality Act to create a domestic refugee resettlement program that provides assistance and services to refugees resettling in the United States. With the enactment of this legislation, the Office of Refugee Resettlement (ORR) established comprehensive requirements for a State-administered refugee resettlement program including child welfare services to unaccompanied refugee minors. The Unaccompanied Refugee Minors (URM) Program currently operates in 15 States and provides the same range of child welfare benefits and services available to other foster children in those States as well as services required by ORR regulation and policy guidance.

Originally, the URM Program provided services for refugee minors arriving from overseas unaccompanied by a parent or adult relative. Over the years Congress passed laws making other special populations already in the United States eligible for the URM Program. A completed URM Program Application must be submitted to ORR for eligibility determination, initiation of placement efforts, and approval to enter the URM Program.

The forms included in this information collection request were previously approved under OMB #0970-0498. We are requesting approval for the forms under a new OMB number, specific to this collection of information. Minor changes are proposed in comparison to the previously approved version of the form. See section A15 for additional information.

2. Purpose and Use of the Information Collection

The URM Program Application is completed on behalf of unaccompanied minors in the United States who are applying for entry into the URM Program. Applications are completed by case managers, attorneys, or other representatives working with minors who are eligible for the URM Program. The application includes biographical data and comprehensive information on the minor and his/her needs (e.g., placement history, family reunification efforts, medical needs, mental and behavioral health needs, etc.). ORR uses the information collected to determine a minor's eligibility for the URM Program, and to facilitate placement in the program. The application information is also used to provide a recommendation to the ORR Director to approve the minor to enter the URM Program.

The Withdrawal of Application or Declination of Placement Form is completed when a minor who has submitted an application for the URM Program wishes to withdraw this application before approval to enter the program, or if the minor has been offered placement and wishes to decline the placement. This form serves as official record for ORR to cease placement efforts, or to offer the proposed placement to another eligible applicant.

3. Use of Improved Information Technology and Burden Reduction

In May 2019, ORR incorporated the URM Program Application into its secure, web-based data collection system called Refugee Arrivals Data System (RADS), which eliminated the submission of applications via email to ORR. In addition to reducing burden and increasing efficiency to those submitting applications, RADS also provides real-time application status updates and allows all parties to communicate about the case during the application and placement process.

4. Efforts to Identify Duplication and Use of Similar Information

ORR is the only entity, Federal, State or local, with authority to determine eligibility for the URM Program and approve minors to enter the program. ORR is responsible for collecting the most complete and accurate picture of the minor's history and needs to ensure the most appropriate URM placement.

5. Impact on Small Businesses or Other Small Entities

The proposed information collection will not burden or impact small businesses.

6. Consequences of Collecting the Information Less Frequently

If the information is not collected, ORR would not have the information necessary to determine a minor eligible for the URM Program, facilitate efforts to place the minor into the program, or recommend to the ORR Director to approve the minor to enter the program.

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

This proposed information collection will not entail any special handling procedures as indicated in the OMB guidance for Paperwork Reduction Act processing.

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 February 28, 2020, Volume 85, Number 40, page 11997, 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

No payment or gift to respondents will be provided.

10. Assurance of Confidentiality Provided to Respondents

ORR has established a system of records to ensure the level of confidentiality pursuant to the Privacy Act, 5 U.S.C. 552(a). The system used to collect URM Program Applications,

ORR’s Refugee Arrivals Data System (RADS), is a Privacy Act System of Records. A System of Records Notice for RADS under 09-80-0325 was published on July 18, 2016.

11. Justification for Sensitive Questions

The URM Program Application collects sensitive information pertaining to a minor’s history of abuse/abandonment/neglect by family members, history of exploitation or human trafficking, physical and mental health needs, and behavioral issues. The information is necessary in order to find the most appropriate placement in the URM Program that will meet the minor’s needs and arrange necessary services.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Unaccompanied Refugee Minors Program Application	350	3	1.50	1,575	525	\$17.81 x 2 (fringe) = \$35.62	\$18,700
Withdrawal of Application or Declination of Placement Form	30	3	0.20	18	6	\$17.81 x 2 (fringe) = \$35.62	\$214
Estimated Annual Burden Total:					531	Estimated Annual Cost Total:	\$18,914

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 2019, which is \$17.81 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$35.62. The estimate of annualized cost to respondents for hour burden is \$35.62 times 531 hours or \$18,914. <https://www.bls.gov/oes/current/oes211093.htm>

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

There are no monetary costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

The cost to the Federal Government includes two staff at the GS-12 level reviewing, summarizing, and reporting on the collected information. The cost to the Federal Government was calculated using the 2020 General Schedule (GS) Locality Pay Table annual rate for a GS-12, which is \$86,335. Therefore, the estimate of annualized cost to the Federal Government to review the collected information is \$172,670.

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf>

15. Explanation for Program Changes or Adjustments

The proposed revisions to each form are minimal from the last OMB approval (previously approved under OMB #0970-0498, expiration 7/31/2020). Certain terms on the forms were changed to improve clarity for respondents. ORR is currently seeking a new OMB number specific to these forms, as they were previously approved as part of another information collection package for ORR’s Unaccompanied Alien Children’s program.

16. Plans for Tabulation and Publication and Project Time Schedule

Applications are received and processed on an ongoing basis, as driven by the need in the field. ORR does not plan to publish the information provided by the respondents.

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

Not applicable; ORR plans to display the expiration date of clearance as set by OMB.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.