

# **UC Licensed Provider Engagement for External Recruiting Efforts**

**Formative Data Collections for Program Support**

**0970 – 0531**

## **Supporting Statement**

### **Part A - Justification**

**July 2021**

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

4<sup>th</sup> Floor, Mary E. Switzer Building  
330 C Street, SW  
Washington, D.C. 20201

## **A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) Office of Refugee Resettlement (ORR) at the U.S. Department of Health and Human Services (HHS) seeks approval for collecting information from Unaccompanied Children (UC) licensed providers for a website that will advertise their permanent employment opportunities. UC licensed providers are ACF grantees.

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

- Development or refinement of program and grantee processes, and the development and refinement and communication systems.
- Obtaining grantee or other stakeholder input

### ***Study Background***

ORR is focused on ensuring that its licensed provider network can adequately house a large number of UC. A major challenge to this effort is the significant number of beds that are not useable due to limited staff. The UC licensed provider network has lost staff for a variety of reasons, including staff taking higher-paying positions at emergency intake shelters (EIS), concerns about pandemic safety, and a broadly difficult labor market.

To help UC licensed providers recruit qualified staff, ACF is voluntarily partnering with the Association of Children's Residential Centers (ACRC) on a website that will serve as a single place for all UC licensed providers to share open workforce positions. This will allow ACF and our partner networks to drive additional interest to that website; job seekers can then directly navigate to provider websites that are of interest to access job application information.

As part of this website, ACRC will collect information from UC licensed providers through an online form. This information is necessary to help facilitate the recruitment and hiring of qualified staff by UC licensed providers. Please refer to *section A2. Process for Information Collection Process* for more details on the process.

### ***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 Use***

This form will allow our partner to populate a website that will serve as a landing page for employment opportunities within the UC licensed provider network. The website will consist of a basic overview of ORR's licensed provider network and a simple, complimentary listing of UC licensed provider names and states with a link to each organization's HR/recruitment website.

This data will allow ACF to help UC licensed providers mitigate their staffing challenges and in turn allow the programs to bring more beds online and house UC in better conditions.

The form collects the organization's name, state, a link to their organization's HR/recruitment website, and their contact information (email, name, and title). The specific use of the information will be to:

1. Identify which UC licensed providers are interested in having their publicly posted websites or job posting boards crosslinked on the website. The website will support the development of a single place to post all UC licensed provider open workforce positions. The goal is to streamline information for job seekers and enable interested individuals to easily review openings and navigate directly to provider websites that are of interest to access job application information.
2. Identify a Human Resources point of contact for each participating UC licensed provider to ensure that all communications about the ACRC website are shared with them as it is refined and built out further.

Note: In the long term, ACRC will refine the website so that UC licensed providers can directly enter and manage their information on the ACRC website.

### ***Process for Information Collection Processes***

To collect information for the website, ACF is planning to work with ORR Division of Unaccompanied Children Operations (DUCO) Program Officers (POs) to distribute the form that UC licensed care programs can use to submit their details. The POs will share a template email (Attachment A) containing context for the broader effort to support staffing and recruitment and provide the link to the voluntary survey, as well as information around its utility and benefits for the program.

Once a couple dozen UC licensed providers have submitted their details, ACRC will add the information to website and make it live.

ACRC will own the website and its development; ACF will assist the POs in collecting the information for the website and will help drive additional interest in employment opportunities in the UC licensed provider network to the website.

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

Information will be collected through an online google form; the link to the form will be distributed through email and the responses will be collected and stored online.

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

There is no online platform that lists all the available employment opportunities within the licensed provider network in one place. The proposed website will allow ACF and our external partners to drive traffic to one website which will serve as a launching point for the various employment opportunities within the licensed provider network.

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

No small businesses will be involved with this information collection.

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

This is a one-time data collection.

#### **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 November 3, 2020, Volume 85, Number 213, page 69627, and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received.

##### ***Consultation with Outside Experts***

No consultations have taken place with experts outside of the project team.

#### **A9. Tokens of Appreciation for Respondents**

No tokens of appreciation for respondents are proposed for this information collection.

#### **A10. Privacy of Respondents**

Names, titles, and email addresses of UC licensed provider staff will be collected but not posted publicly to provide a point of contact for website refinements that let organizations directly enter

and manage their information on the website. This personally identifiable (PII) information will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their PII will be kept private to the extent permitted by law. Information about the organization will be posted publicly and the purpose and use of the information will be clearly explained to respondents.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals’ personal identifier.

**A11. Sensitive Questions**

There are no sensitive questions in this data collection.

**A12. Estimation of Information Collection Burden**

***Burden Estimates***

ACF anticipates that the form will take each grantee about 5-10 minutes per response. Burden has been estimated using the higher bound of 10 minutes per response and ACF anticipates about 50 providers will submit the form.

***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Human Resources Assistants, Except Payroll and Timekeeping [43-4161] and wage data from May 2020, which is \$21.24 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$42.48.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
UC Provider Careers Organization Information Form	50	1	.167	8.35	\$42.48	\$354.71
Total Burden and Cost Estimates:				8		\$354.71

**A13. Cost**

There are no additional costs to respondents.

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

The total cost for the data collection activities under this current request will be \$354.71. ACF and ACRC are engaged in a voluntary partnership with no contractual agreements. The form was developed by ACRC.

**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 data collection process is approved, ACF will request POs work with their programs to solicit the requested information. Information will be collected over about a one week period.

The information will be published on a public website (excluding respondent's name, title and email). The link to the website will be shared in upcoming webinars, on other websites, on social media, and other communication channels.

**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.