Office of Refugee Resettlement (ORR) Services for Survivors of Torture (SOT) Program Data Points (PDP) and Performance Progress Reports (PPR)

OMB Information Collection Request
0970 - New

Supporting Statement Part A - Justification

September 2022

1. **Circumstances Making the Collection of Information Necessary**

   The Administration for Children and Families (ACF) Office of Refugee Resettlement (ORR) intends to collect demographic, programmatic, and outcome data on Services for Survivors of Torture (SOT) grant recipients and the clients they serve. This collection of information is necessary for grant monitoring and is authorized under Section 5(a) of the "Torture Victims Relief Act of 1998," Pub. L. 105-320 (22 U.S.C. § 2152 note) Assistance for Treatment of Torture Victims.

   ORR will collect these data on the new cohort of Services for SOT grant recipients. ORR collected information from the previous grant recipient cohort under the Generic Performance Progress Report (PPR) (OMB #0970-0490) but have made changes to the data collection instruments for use in the new cohort based on information gathered during grantee feedback sessions to add additional guidance and clarity to streamline data collection and are now requesting approval under an individual OMB number specific to these Program Data Points (PDP) and PPRs.

2. **Purpose and Use of the Information Collection**

   Grant recipients submit aggregated data on new and continuing clients annually, including demographic information, characteristics related to experiences of torture, services received, and well-being across six outcome domains. Grant recipients will also provide information about community attendance at trainings and pro-bono services donated to the program. This data collection will allow ORR to learn more about the populations served by SOT grant recipients; the types and effectiveness of services provided; methods, challenges, and facilitators of implementing services; and grant recipients' progress towards programmatic goals. The data collected will also be used for collaborative research projects to provide technical assistance to grant recipients. A summary of the information collected will be used by ORR in reports to stakeholders, including a required report to Congress, and in responses to funding requests.

3. **Use of Improved Information Technology and Burden Reduction**

   PDPs: Data entry for PDPs takes place in the ORR Refugee Arrivals Data System (RADS), an information technology platform used for enhanced data collection and record keeping. To facilitate data entry, ORR will provide an optional tracking spreadsheet where grant recipients can enter individual client information and produce an aggregated report to enter into RADS.

   PPRs: PPRs are primarily narrative reports on grant recipients' progress towards their goals and are formatted as Word documents or PDFs. Grant recipients submit PPRs to ORR by uploading their files to GrantSolutions, an internet portal.

4. Efforts to Identify Duplication and Use of Similar Information

This is a new data collection for a new cohort of SOT grant recipients. ORR is the funding agency for the SOT program and as such is the only agency collecting program-specific information of this kind from the grant recipients.

5. Impact on Small Businesses or Other Small Entities

Respondents are recipients of a Services for SOT grant and may include some Small Entities as grant recipients are comprised of non-profit social service, health, and higher education organizations, states, municipalities, and for-profit organizations. To reduce the burden on grant recipients, ORR has expanded and clarified reporting guidance, developed an optional data validation worksheet to promote data quality, and is developing an optional client tracking tool recipients can use to aggregate data.

6. Consequences of Collecting the Information Less Frequently

SOT grant recipients receive five-year awards, and PDP reporting occurs at the end of each fiscal year while PPR reporting occurs at mid-year and at the end of each fiscal year. Not collecting this information or collecting this information less frequently would compromise ORR's ability to assess the performance of the SOT program, track how grant recipients are using government funds, the demographic information of the clients, and the outputs and outcomes of the program.

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

The special circumstances listed under 5 CFR 1320.5 are not applicable to this collection of information.

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 Tuesday, June 14, 2022, Volume 87, Number 114, page 35982, and provided a sixty-day period for public comment. We did not receive comments.

In 2021, consultants for ORR conducted feedback sessions with 8 representatives from 5 SOT grant recipients in different regions of the country. The purpose of the feedback sessions was to provide insight into staff perspectives on the current SOT program reporting

requirements and the RADS data tracking system, including challenges programs face in data collection and reporting. Generally, program staff felt both the required program output and outcome indicators in the PDPs were comprehensive and adequately captured key information about their clients and the services their programs offer. Additionally, program staff were, in most cases, satisfied with the current annual reporting frequency for the PDPs. Program staff indicated that the RADS system can be "clunky" and challenging to navigate, but they had found technical support from ORR to be helpful. Specifically, staff mentioned that the PDP user guide was comprehensive and clear, and that ORR's data entry webinars were helpful to supplement the instruction in the user guide. Staff also share that ORR's regular updates to the response options for the data points within the RADS system made entering data easier. Regarding the PPRs, program staff appreciated that the narratives not overly structured because it allows staff to highlight unique aspects of the program that can be difficult to portray in more standardized reporting measures. ORR used feedback gathered during the sessions to update the instruments and guidance documents, including adding an "unknown" field to relevant data points and updating the User Guide to provide additional clarity.

9. **Explanation of Any Payment or Gift to Respondents**

No payment or gift will be provided to respondents. Completing this collection of information is a condition of the SOT grant award.

10. **Assurance of Confidentiality Provided to Respondents**

No assurance of confidentiality is provided, but ORR makes best efforts to maintain the privacy of all records. This information collection does not include client-level identifiable information but grant recipients and some grantee staff may be named.

11. **Justification for Sensitive Questions**

The PDPs include aggregated responses to sensitive questions relating to the nature of the torture clients experienced and the reasons they were targeted for torture. The majority of this is information that recipients already collect from clients as part of their client intake process; as such, the information is not collected solely for the PDPs. SOT recipients report aggregate program data and do not include individual client data.

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	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Program Data Points Form (PDPs)	35	1	6	210	$73.84	$15,506.40
Performance Progress Reports (PPRs) – Parts A and B	35	2	6	420	$73.84	$31,012.80
Estimated Annual Burden Total:				630	**Estimated Annual Cost Total:**	**$46,519.20**

Burden for the PDPs was calculated by estimating the length of time it would take the respondent to review instructions, collate the information needed to respond to the 19 Program Indicators and 7 Outcome Indicators on the form, and enter the data into the RADS database. Burden for the PPRs was calculated by estimating the length of time it would take the respondent to review instructions, complete the data elements (1 through 9), sign the PPR Cover Page, collate information, and provide performance narratives for the three Program Assessment Areas.

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Community and Social Service Managers [11-9151] and wage data from May 2021, which is $36.92 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $73.84. The estimate of annualized cost to respondents for hour burden is $73.84 times 630 hours or $46,519.20.
https://www.bls.gov/oes/current/oes_stru.htm

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

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

Information Collection Title	Total Number of Federal Employees	Average Number of Hours Per Staff	Average Total Number of Hours	Average Hourly Wage	Total Annual Cost
Program Data Points Form (PDPs)	2	20	40	$101.60	$4,064
Performance Progress Reports (PPRs) – Parts A and B	2	18	36	$101.60	$3,657.60
Estimated Annual Hours Total:			76	**Estimated Annual Cost Total:**	**$7,721.60**

The cost to the Federal Government was calculated using the hourly rates for General Schedule 12 and General Schedule 13 positions which is $50.80 per the Office of Personnel Management (OPM) 2022 General Schedule Locality Pay Tables. To account for fringe benefits and overhead the rate was multiplied by two which is $101.60. The estimate of annualized cost to the Federal Government is $101.60 times 76 hours or $7,721.60. https://www.bls.gov/oes/current/oes_stru.htm

15. Explanation for Program Changes or Adjustments

This is a new information collection.

16. Plans for Tabulation and Publication and Project Time Schedule

No complex analyses are planned for this data. ORR will produce summary information describing the PDP data on an annual basis to share with Congress for appropriation requests and annual reports and with SOT program recipients to share trends in the demographics of clients served and service outcomes.

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

Exemption from displaying OMB expiration date is not being sought.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.