

**To:** Kelsi Felz  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Joel Polanco  
Office of Refugee Resettlement  
Administration for Children and Families (ACF)

**Date:** May 24, 2023

**Subject:** NonSubstantive Change Request – *Immigration Legal Services for Afghan Arrivals Event Registration and Event Feedback Forms* (OMB #0970-0401)

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This memo requests approval of nonsubstantive changes to the approved information collection, *Immigration Legal Services for Afghan Arrivals (ILSAA) Event Registration and Event Feedback Forms*, approved under the Generic Clearance for the Collection of Routine Customer Feedback (OMB #0970-0401).

### ***Background***

OMB approved the ILSAA Event Registration and Feedback Forms on April 13, 2023 under OMB #0970-0401. Since this approval, we have revised the total burden estimates based on new information and projections related to how many respondents we expect for each form and how many events and/or trainings will be held. This includes a reduction in the number of respondents for legal service providers and additional event registrations for State Refugee Coordinators and partner organizations (e.g., legal clinics, non-governmental organizations, community-based organizations). This also includes feedback for events as well as for trainings of legal service providers.

### ***Overview of Requested Changes***

To account for these burden changes, we have updated our submission form to reflect the following changes.

*ILSAA Event Registration Form* – We anticipate a reduction in the original estimate for the number of legal service providers. We have reduced the estimated number of respondents from 250 to 60 annually. Additionally, we have added 35 respondents representing state refugee coordinators and partner organizations. This will change the burden to reflect a total of 95 respondents completing approximately 4 forms each annually.

*ILSAA Event Feedback Form* – We anticipate a reduction in the original estimated number of respondents from 250 to 155. The new estimate includes 95 respondents who will participate in up to 4 events annually (as described in the event registration burden above) and 60 respondents who participate in up to 4 trainings annually. Respondents will complete the feedback form up to 4 times annually though there may be overlap in individuals from events and trainings.

*Federal Cost* – We have adjusted the cost to the federal government to fix a mistake in

calculations in the original submission.

The following updates have been made to the submission form.

**BURDEN HOURS**

<b>Information Collection</b>	<b>Category of Respondent</b>	<b>Annual No. of Respondents</b>	<b>Annual No. of Responses per Respondent</b>	<b>Estimated Time per Response</b>	<b>Annual Burden Hours</b>
ILSAA Event Registration Form	Individuals (Original)	250	3	0.017	12.75
	<b>Individuals (revised)</b>	<b>95</b>	<b>4</b>	<b>0.017</b>	<b>6.46</b>
ILSAA Event Feedback Form	Individuals (original)	250	3	.05	37.5
	<b>Individuals (revised)</b>	<b>155</b>	<b>4</b>	<b>0.05</b>	<b>31</b>
<b>Totals</b>					<b>37</b>

**FEDERAL COST:** The estimated annual cost to the Federal government is \$2,238.