

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Welcome Corps Application 1405-0256

JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

The U.S. Immigration and Nationality Act (INA), as amended by the Refugee Act of 1980, allows for the admission as refugees of persons of special humanitarian concern to the United States who can establish that they have suffered past persecution or have a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion. See INA §§ 101(a)(42) and 207; 8 U.S.C. §§ 1101(a)(42) and 1157. The law also provides for resettlement assistance to be provided to arriving refugees, including initial reception and placement with a sponsor. See INA § 412; 8 U.S.C. § 1522.

In Executive Order 14031 on “Rebuilding and Enhancing Programs to Resettle Refugees and Planning for the Impact of Climate Change on Migration” issued in February 2021, President Biden directed the Department of State and Department of Health and Human Services to “capitalize on...private sponsorship of refugees” as part of efforts to “meet the challenges of restoring and expanding the [U.S. Refugee Admissions Program].” To fulfill this directive, the Department of State is rolling out a program for private sponsorship of refugees approved for admission to the United States through the U.S. Refugee Admissions Program (USRAP), named “the Welcome Corps” in two phases. In the first phase of the Welcome Corps, private sponsors apply to be matched with a refugee case already being processed through the USRAP. In the second phase of the Welcome Corps, private sponsors apply to refer specific refugee applicants to PRM to determine if they qualify for access to USRAP through the Priority 4 (P-4) Privately Sponsored Refugees category. The P-4 category, along with the other categories of cases that have access to the USRAP, is outlined in the annual Proposed Refugee Admissions – Report to Congress, which is submitted on behalf of the President in fulfillment of the requirements of Section 207(d) of the Immigration and Nationality Act (8 U.S.C. §1157) and authorized by the annual Presidential Determination for Refugee Admissions.

Both phases of the Welcome Corps will operate in parallel, providing private sponsors the option of choosing whether they will support refugee cases to whom they are matched or specific refugee applicants they refer to the USRAP through the P-4 category. Through the Welcome Corps application process, private sponsors accept primary responsibility to welcome arriving refugees and to provide core services/assistance to support their initial

resettlement equivalent to what is provided by nonprofit resettlement agency partners through the U.S. Government-funded Reception and Placement (R&P) program. Two types of private sponsors will participate in the Welcome Corps: Private Sponsor Groups (PSGs), groups of at least five or more individual American citizens or permanent residents who will be able to apply to sponsor the resettlement of refugees; and Private Sponsor Organizations (PSOs), established and/or incorporated organizations who will be able to apply to mobilize, organize, oversee, and/or offer support to PSG.

During the Welcome Corps application process, information is collected from PSGs and PSOs to facilitate the placement of approved refugee applicants with private sponsors and to plan for refugee applicants to travel to the appropriate location of private sponsors within the United States. In instances where private sponsors are seeking to refer specific refugee applicants to access theUSRAP through the P-4 category, additional information is collected on those applicants to assess whether they meet the eligibility criteria to access theUSRAP through the P-4 category. The information collected on refugee applicants will also assist Department of Homeland Security's U.S. Citizenship and Immigration Services (USCIS) officials in conducting adjudications of applicants' refugee status.

2. What business purpose is the information gathered going to be used for?

The Department of State's Bureau of Population, Refugees, and Migration (PRM) has entered into a cooperative agreement with the Community Sponsorship Hub (CSH), to manage a consortium of non-governmental organizations (NGOs) to establish and oversee an online application process to intake applications from PSGs/PSOs and screen their applications for approval for participation in the Welcome Corps. Specifically, PRM has selected a consortium comprised of Church World Service, the Community Sponsorship Hub, Integrated Refugee and Immigrant Services, the International Refugee Assistance Project, the International Rescue Committee, and Welcome.US. Several of these organizations have deep experience in securely collecting refugee placement information as participants in the Reception and Placement Program.

As part of the online application process, the NGO consortium collects information on PSGs as part of completed applications submitted electronically by prospective private sponsors through the program website that is being built and managed by the consortium (www.welcomecorps.org). This includes biographic information on each member of the PSG, evidence that each member of the PSG has completed the required background checks through a third-party identified by the consortium, evidence that at least one member of the PSG has completed required online training developed by the consortium, and details on how PSGs will plan to provide initial resettlement support to the refugees that are matched to them through the Welcome Corps. In addition, the NGO consortium oversees a separate application process for PSOs and collect information from PSOs accordingly. This includes biographic information for a key point of contact at the PSO, background information on the organizational structure of the PSO, and information on the PSO's organizational resources and staffing capacity to mobilize, support, and oversee PSGs. Most of this information is not shared with PRM since PRM is funding the consortium to manage the application process for PSGs and PRM has no operational need to see information like evidence of completion of

required training.

To support PRM's operational requirements to facilitate placements of refugee cases with PSGs, including those supported by specific PSOs, the consortium will specifically share key biographic information on points of contact for PSGs (and PSOs as relevant) with PRM, such as the name of the designated point of contact along with that PSG member's address, phone number, e-mail address, and other relevant contact information.

For the second phase of the Welcome Corps, applications from PSGs and PSOs will include referrals of specific refugee applicants that PSGs/PSOs seek to support. These referrals will also be submitted electronically by PSGs and PSOs through the program website. Referrals of refugee applicants will include biographic information of each applicant being referred, claimed relationships of the principal applicant to all derivatives on the referral, applicants' immigration status in the country of asylum, a narrative of the principal applicant's refugee claim, and supporting documentation. All information collected by the NGO consortium through referrals will be shared with PRM so that PRM can assess whether refugee applicants meet the eligibility criteria to access the USRAP through the P-4 category.

The consortium will electronically transmit information on private sponsors and refugee applicants to PRM's Refugee Processing Center (RPC) through secure means. The information on PSGs and PSOs will enable PRM to facilitate the matching of approved refugee applicants with approved PSGs and to track the placement of refugee applicants with PSGs (including those linked to specific PSOs), similarly to how PRM facilitates and tracks placement of refugee applicants supported by PRM's funded resettlement agency partners through the R&P Program. This will enable PRM to have a record of the relevant point of contact for each resettled refugee case supported by private sponsors through the Welcome Corps. The information on refugee applicants will enable PRM to determine whether applicants meet the eligibility criteria to be granted access to the USRAP through the P-4 category. Those meeting the eligibility criteria will be granted access to the USRAP for refugee case creation and further processing including USCIS adjudication of refugee status. Those referred refugee cases approved for resettlement in the United States will subsequently be served by the private sponsors who referred them.

3. Is this collection able to be completed electronically (e.g. through a website or application)?

PSG applicants will submit all application materials (including their biographic information and information referred refugee applicants when applicable) through the online application portal owned by the NGO consortium (www.apply.welcomecorps.org/s/) that is on the consortium-owned Welcome Corps program site (www.welcomecorps.org). Separately, PSO applicants will directly submit all application materials (including key biographic information for a PSO point of contact) over email to the NGO consortium to be approved as certified PSOs participating in the Welcome Corps. PSOs will submit referrals of refugee applicants electronically through the program site. The NGO consortium will share the necessary PSG and PSO contact information, and all information on referred refugee applicants, with RPC by secure means. In turn, the RPC will coordinate the input of

information on PSGs, PSOs, and referred refugee applicants into START, the State Department's electronic case management system for USRAP cases. Initially, this process may entail manual exchange of information between the NGO consortium and the RPC through a secure file sharing platform.

4. *Does this collection duplicate any other collection of information?*

There is no duplication of collection. The Department of State does not otherwise collect information on private sponsors or referred refugee applicants to facilitate the placement of approved refugee applicants with private sponsors.

5. *Describe any impacts on small business.*

This information collection will not impact small business.

6. *What are consequences if this collection is not done?*

Without collecting information on PSGs and PSOs, PRM would not be able to facilitate the placement and travel of refugees with PSGs (including PSGs overseen and supported by specific PSOs) and, in turn, would be unable to implement the Welcome Corps. Without collecting information on referred refugee applicants, PRM would not be able to assess eligibility of applicants and grant them access to the USRAP for refugee case creation and processing.

7. *Are there any special collection circumstances?*

The NGO consortium will collect this information only once when PSGs and PSOs submit their applications. Updates will be recorded if there are changes to the data during resettlement processing.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

The Department published a 60-day notice in the Federal Register to solicit public comments on this collection. The public submitted three comments to regulations.gov and four via email. The Department determined that two comments required a response. The first concerned requirements on the user experience and accessibility considerations for the Welcome Corps Application and the second concerned the size of private sponsor groups, as well as the inability for Russian citizens to access refugee protection outside of Russia, in particular Europe, and therefore calls for a new parole program to be established for Russians. See attached document for responses.

Accessibility and user experience is a priority for PRM. PRM continues to coordinate with the U.S. Digital Service (USDS) and the PRM-funded Welcome Corps consortia, which is led by the Community Sponsorship Hub (CSH), to ensure that the Welcome Corps sponsor application and refugee referral form are designed in a way that takes into account accessibility, informed by iterative user research, and streamlined across systems. The user research and testing conducted thus far highlighted several opportunities for improvement. The results concluded that users prefer to answer specific and plain language questions in the Welcome Plan and complete it over time and not in one sitting. In response to this feedback, CSH built in a “Save as Draft” function in the online application and revised the Welcome Plan questions to use plain language.

Users also shared their interest in more resources to help them complete the Welcome Corps application, specifically resources for applicants of varied digital literacy levels and non-native English speakers. PRM continues to work with consortia partners with this feedback in mind to redesign the Welcome Corps website and other resources that clearly explain the private sponsorship process, the expectations and commitments of sponsoring a refugee, and how to complete an application; all of which will be translated into several languages.

With regard to size requirements of private sponsor groups, PRM maintains the requirement that private sponsor groups must be comprised of at least five individual American citizens or permanent residents over the age of 18. Resettling a newcomer is a significant undertaking – under the Welcome Corps, private sponsor groups are responsible for delivering core sponsorship services and completing reporting requirements similar to those offered through teams of professional caseworkers under the traditional Reception and Placement (R&P) Program. Furthermore, during Operation Allies Welcome, CSH entered into a Memorandum of Understanding (MOU) with PRM to manage the Sponsor Circle for Afghans (SCP) program, which allowed Americans to privately sponsor Afghan evacuees. While SCP is no longer operational, CSH leverages similar framework to oversee the Welcome Corps, including the requirement of at least five individuals per sponsor group. The requirement of at least five individuals per private sponsor group is a safeguard to the program, in particular to the refugee beneficiaries, and is also intended to help private sponsor groups ensure their capacity to welcome and support refugees through their first months of arrival.

With regard to the respondent’s proposal for a new parole program for Russian citizens given their challenges in accessing refugee protections outside of Russia, the Department notes that at this time we are unable to implement the USRAP in Russia due to host government requirements and security concerns, and further notes that the INA grants parole authority to the Secretary of Homeland Security to use at their discretion; therefore, the Department does not have the authority to implement a new parole program for Russians.

9. Are payments or gifts given to the respondents?

There are no payments or gifts to respondents.

10. Describe assurances of privacy/confidentiality

Private sponsor applicants will be notified by the NGO consortium overseeing the application process that the relevant information in their applications will be released to State Department personnel, local government officials (e.g., State Refugee Coordinators), approved refugee applicants, and resettlement agency employees on a need-to-know basis. Disclosure of information will be restricted in accordance with provisions of the cooperative agreement between the NGO consortium and the State Department. This information collection is covered under the Systems of Records Notice entitled State-59, Refugee Case Records.

11. *Are any questions of a sensitive nature asked?*

As part of referrals, PSGs and PSOs will be asked to provide a narrative of the applicant's refugee claim which may include information of a sensitive nature. The refugee claim narrative will document whether the applicant has either experienced past persecution or if they have an existing well-founded fear of persecution. Refugees may be persecuted on grounds of race, religion, nationality, membership of a social group, or political opinion. Past persecution may be documented on the refugee referral and may involve rape, torture, assault, and other forms of physical violence. The NGO consortium will conduct an initial review of the narrative of the applicant's refugee claim before sharing the referral information with PRM to determine whether the applicant meets the eligibility criteria for access to the USRAP through the P-4 category. The narrative of the refugee claim will also support USCIS officials in conducting adjudications of applicants' refugee status.

Refugees will be notified by the NGO consortium overseeing the application process that the information in their applications will be released to State Department personnel, local government officials (e.g., State Refugee Coordinators), approved refugee applicants, and resettlement agency employees on a need-to-know basis. Disclosure of information will be restricted in accordance with provisions of the cooperative agreement between the NGO consortium and the State Department.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*

In the first year of the Welcome Corps, PRM will aim for at least 2000 PSGs to participate. Since this is a new program, our calculation of hour time burden and hour cost burden is based on the assumption of meeting the goal of at least 2000 PSGs participating in the program.

We estimate that it will take approximately two hours for each PSG to collect the necessary information to submit a complete PSG application including providing key biographic details, meaning that total hour burden is estimated to be 4,000 hours (2,000 Private Sponsor Groups x two hour estimated time for information collection = 4,000 hours).

If one member of a PSG will lead on the submission of the application, and that it will take

that individual two hours to collect the information for submission and earned of \$28.01 per hour¹, the hour cost burden would be \$168,060.00. This is based on the calculation of \$28.01 (average hourly wage) x 1.5 (weighted wage multiplier) times 4000 hours.

In addition, the NGO consortium will aim for at least 20 PSOs to be mobilized. We estimate that it will take approximately three hours for a point of contact at a PSO to collect the necessary information to submit a complete application including providing key biographic details for the PSO point of contact, meaning that total hour burden is estimated to be 60 hours (20 PSOs x three hour estimated time for information collection = 60 hours).

If a dedicated point of contact at a PSO will lead on the submission of the application, that it will take that individual three hours to collect the information for submission, and that individual earned of \$28.01 per hour¹, the hour cost burden would be \$2,520.90. This is based on the calculation of \$28.01 (average hourly wage) x 1.5 (weighted wage multiplier) times 60 hours.

We further estimate that approximately 80% of PSGs and PSOs will submit specific referrals of refugee applicants that they wish to sponsor, for a total of 1,616 refugee referrals (1,600 from PSGs and 16 from PSOs). We estimate that it will take an average of three hours to collect the necessary information on refugee applicants to submit a referral, including key biographic information on each refugee being referred and a short narrative of their refugee claim, meaning that total hour burden is estimated to be 4,848 hours (1,616 refugee referrals x three hour estimated time for information collection = 4,848 hours).

If one PSG or PSO point of contact will lead on the submission of each refugee referral, that it will take that individual three hours to collect the refugee information for submission, and that individual made a wage of \$28.01 per hour, the hour cost burden would be \$203,688.72. This is based on the calculation of \$28.01 (average hourly wage) x 1.5 (weighted wage multiplier) times 4,848 hours.

The total burden consists of approximately 2,020 respondents with a total time burden of 8,908 hours.

13. Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.

There is no monetary cost for private sponsors and referred refugee applicants to provide their information as part of the application process for private sponsors to participate in the Welcome Corps.

14. Describe the cost incurred by the Federal Government to complete this collection.

PRM will provide the NGO consortium \$5.0 million in Fiscal Year 2023 to establish the core infrastructure for the Welcome Corps, including but not limited to the establishment of an application system for PSGs and PSOs which will include the collection of information on private sponsors and referred refugee applicants as applicable. In terms of RPC staff time,

RPC staff estimate devoting 135 minutes to process the information on a PSG (and PSO if relevant) for each match of an approved refugee applicant to an approved PSG (including PSGs that are linked to a specific PSO). The cost to the RPC of this processing, at a \$44.00 hourly rate, is approximately \$198,000.00. That is based on the calculation of \$44.00 (hourly rate) times 2.25 hours (135 minutes) times 2,000 PSGs.

Overseas Resettlement Support Centers (RSCs) will be responsible for ingesting refugee referral information into the START, the State Department's electronic case management system for USRAP cases. RPC staff, who operate a similar program that involves ingesting applications into START, estimate that RSC will spend 135 minutes to incorporate all collected refugee information into START. The cost to the RSC for this processing, at a \$60.00 hourly rate, is approximately \$218,160.00. That is based on the calculation of \$60.00 (hourly rate) times 2.25 hours (135 minutes) times 1,616 refugee referrals. The total estimated cost to the federal government of this information collection is \$5,416,160.00.

15. Explain any changes/adjustments to this collection since the previous submission

The title of the information collection has changed, from "Private Sponsor Information" to "Welcome Corps Application."

The number of respondents and total burden hours were incorrectly reflected in the previous approval. The number of respondents is increased from 2,000 to 2,020, and the total burden hours is increased from 4,000 to 8,908.

The previous submission only included collection of information from PSGs and PSOs. As the second phase of Welcome Corps will allow for PSGs and PSOs to refer specific refugee applicants to the USRAP, adjustments were made to outline the additional collection of information on refugee applicants.

16. Specify if the data gathered by this collection will be published.

The State Department will not publish the data gathered by this collection.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date. Otherwise, write "The Department will display the OMB expiration date."

The Department will display the OMB expiration date for approval of the information collection.

18. Explain any exceptions to the OMB certification statement below. If there are no exceptions, write "The Department is not seeking exceptions"

to the certification statement”.

The Department is not seeking exceptions to the certification statement.

COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.