

Voluntary Agencies Matching Grant Program Data Reporting

**OMB Information Collection Request
0970 - NEW**

Appendix A - Summary of Public Comments and ORR Responses

Type of Request: New

November 2023

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

ORR expresses its appreciation to the public for the thoughtful and detailed comments in response to this information collection request.

General Comments on the Proposed Information Collection

1. One commenter expressed that ORR has not engaged resettlement agencies to reduce administrative inefficiencies that are limiting the capacity of local resettlement offices.

ORR Response: ORR appreciates the issues raised by the commenter and is committed to partnering with resettlement agencies to streamline reporting activities and lessening administrative burden. ORR has worked in recent years to transition reporting from manually created spreadsheets that had to be emailed back and forth to the secure Refugee Admissions Database System (RADS), which offers tools to validate and correct data more easily and provides a variety of reports and visual tools agencies can use to track their progress. ORR's RADS team schedules regular meetings with resettlement agencies to share RADS enhancements and gather feedback for further enhancements. Internally, ORR is actively engaged in a data modernization process, working to align data captured across ORR programs and reduce duplication. ORR will continue to look for ways to improve efficiency in all reporting activities and will be providing updates to stakeholders in the coming months across a number of programs.

2. One commenter highlighted the historic arrival of Afghan and Ukrainian Humanitarian Parolees as one example of how resettlement agencies are trying to meet the needs of high arrivals while also meeting increased government reporting requirements.

ORR Response: ORR recognizes the efforts of resettlement agencies in responding to increased arrivals. As described above, ORR is actively engaged in efforts to improve the efficiency of reporting activities and will continue to partner with resettlement agencies to work towards this goal.

Comments on the Proposed Reporting Schedule

1. One commenter asked if quarterly submissions would be possible, due to staffing requirements.

ORR Response: As outlined in the Data Reporting Form and Instruction, the proposed Matching Grant Program Data Reporting has three parts: a Client Information Form, A Matching Grant Enrollment Form, and a Matching Grant Status Form. ORR proposes that resettlement agencies upload the Client Information and Enrollment Forms after the close of each month for all clients enrolled into the program during that month. Resettlement agencies would upload the Status Form twice annually, at the middle of the program year, and the end of the program year. In other words, only new client enrollments and client information will be uploaded monthly. Client outcomes will only be uploaded twice a year.

ORR believes that this reporting schedule is justified and necessary to meet ORR's statutory requirements. Section 412(a)(3) of the INA (8 U.S.C. § 1522(a)(3)) requires that the ORR Director "make a periodic assessment, based on refugee population and other relevant factors, of the relative needs of refugees for assistance and services under this subchapter and the resources available to meet such needs. ...In allocating resources, the Director shall avoid duplication of services and provide for maximum coordination between agencies providing related services." In addition, Section 412(a)(7) of the INA (8 U.S.C. § 1522(a)(7)) requires ORR to develop a system to monitor the assistance provided under the Refugee Act that includes evaluation of the effectiveness of the program and data collection on the services provided and the results achieved.

Monthly reporting of client information and enrollments is needed to provide timely and accurate program data to the ORR Director. Resettlement agencies would be collecting and recording this

information already to manage their programs. ORR is asking agencies to upload such information to RADS after each program month. Having up-to-date enrollment data is necessary to track the pace of enrollments and proactively adjust funding allocations if needed. Real-time forecasting is critical to resource allocation decisions. Under the PRA, after the addition of a tenth resettlement agency ORR would no longer be able to request any ad-hoc enrollment reports outside of the approved reporting windows, preventing ORR from making timely evidence-based funding decisions. Quarterly or biannual uploads would not be frequent enough to enable such real-time decision-making.

Monthly uploads also reduce the likelihood of dual enrollments and duplicative services. Clients may approach more than one agency for Matching Grant services or move to a new location after enrolling in the program. If a client is enrolled in Matching Grant in more than one resettlement agency site, this can be caught quickly in RADS. With less frequent uploads, it is more likely that clients could be enrolled at multiple sites for an extended period.

ORR believes that resettlement agencies have sufficient ORR-funded staffing to carry out the proposed monthly reporting requirements. Nine resettlement agencies already submit aggregate monthly enrollment reports to ORR via email and outcome reports twice a year via RADS. Monthly submissions via RADS should not require additional staff. As discussed in more detail below, the RADS system will also introduce two sets of quality check functionality that will streamline the data upload process and significantly reduce manual data correction time.

2. One commenter proposed biannual reporting, suggesting that monthly reporting is not efficient and would increase data discrepancies.

As described above, monthly reporting of client information and enrollments is needed to provide timely and accurate program data to the ORR Director to allow for real-time decision-making and funding adjustments. Monthly uploads also reduce the likelihood of dual enrollments and duplicative services. Biannual reporting would not be frequent enough to allow for timely program funding adjustments. It would also increase the risk of duplicative services by delaying identification of such duplication. As discussed in more detail below, the RADS system will also introduce two sets of quality check functionality that will streamline the data upload process and significantly reduce manual data correction time. These enhancements will result in more efficient data uploads with fewer data discrepancies.

Comments on Respondent Burden Estimates

1. One commenter suggested that ORR's burden estimate was too low, given the expected growth in Matching Grant enrollments in the coming year.

ORR Response: Burden estimates provided by this commenter suggest that there will be significantly higher numbers of Matching Grant enrollments in FY 2024 compared to FY 2023. However, ORR does not in fact expect significantly higher Matching Grant enrollments in the current fiscal year given eligibility for Afghan parolees has ended and continued eligibility for Ukrainian parolees after October 1, 2023 is uncertain. ORR does anticipate that refugee arrivals may significantly increase in FY 2024. However, Matching Grant Program enrollments are not anticipated to exceed previous fiscal year cumulative population totals due to the more recent pattern of under-enrolling allocated slots. As such, ORR has not revised the respondent burden estimate.

2. One commenter suggested that ORR's burden estimate was too low given a lack of tools available within RADS to support data quality assurance activities, such as to run quality assurance reports in RADS or export data from RADS.

ORR Response: ORR and the RADS teams will ensure that resettlement agencies are able to perform quality assurance activities within RADS prior to implementation of the new data reporting. The RADS system will introduce two sets of quality check functionality. Both will allow resettlement agencies to download detailed records for further analysis. First, within the RADS system there will be new search functions that will allow users to filter on certain characteristics of their cases to identify issues that need to be corrected. Once the search is done the data will be accessible via a spreadsheet download. Corrections can be made either by re-uploading the case data or entering corrected information directly into the case management portion of the RADS. Second, there is a reporting subsystem to RADS based on the Tableau analysis tool set. It will contain similar functionality to filter cases and provide additional analysis. Users will also be able to download cases in a spreadsheet format from this subsystem. These enhancements are in development currently and were developed based on feedback from resettlement agencies. ORR believes this new functionality will streamline data quality activities significantly and has therefore not amended its original burden estimates for respondents. ORR remains committed to partnering with resettlement agencies to improve efficiency in all data and reporting activities.

Comment on the Implementation Timeline

1. Two commenters requested that resettlement agencies be given six months to update their database systems to support this information collection, after the collection is approved and requirements shared with the resettlement agencies.

ORR Response: The reporting schedule chart included in the instructions is noted as a *sample* timeline to provide a sense of the typical annual reporting schedule. ORR cannot begin implementation of the new proposed reporting until it is approved by OMB. At such time, ORR will provide detailed requirements for resettlement agency database enhancements. ORR hopes that reporting can begin at some point in FY 2024, but a more exact implementation timeline will depend on the timing of OMB approval and other factors. ORR understands that such enhancements will take time to develop and test and will work with resettlement agencies to ensure a smooth transition.

Comment on How Data Will be Used to Analyze Resettlement Agency Performance and Funding

1. One commenter asked if data submitted will be considered in annual funding allocations, and whether feedback will be provided to resettlement agencies on the data they submit.

ORR Response: ORR already assesses resettlement agency performance based on data currently submitted. Currently, resettlement agencies are informed that their annual Matching Grant Program grant amounts are established by the ORR Director based on one or more of the following factors: availability of Federal funding and each grantee's anticipated percentage of newly arrived ORR eligible populations, past Matching Grant Program performance, agreement with ACF's General Terms and Conditions, and the Matching Grant Program's Guidelines. ORR will continue to assess resettlement agency performance by analyzing enrollment and outcome data submitted via RADS, and such performance may influence program funding decisions.

Comments on Specific Data Fields

1. Commenters asked questions or proposed revisions to the list of acceptable values for certain data fields, as seen in the chart below.

ORR Response: ORR responses to these comments can be found in the chart below.

Immigration Status Acceptable Values	Public Comment	ORR Response
---	-----------------------	---------------------

REF	One commenter suggests the use of “U.S. Citizen” rather than “U.S. born (insert immigration type)”. The commenter notes that the ORR-proposed option is an inaccurate description of the child’s immigration status, and that the commentor anticipates confusion for minors with parents who do not possess the same immigration status.	ORR notes that its proposed option is not intended to reflect the child’s immigration status in a larger context but solely the basis on which the child is eligible for ORR benefits and services. Given that US citizens in general are not eligible for ORR services, the options in this list clarify the narrow exceptions for US-born children based on their parent’s or parents’ eligibility for ORR services. This list of acceptable values for Immigration Status is the same across several ORR reporting instruments, and ORR proposes to retain it.
ASY		
CHE		
SIV		
VOT		
AMR		
AHP		
UHP		
U.S. born REF		
U.S. born ASY		
U.S. born CHE		
U.S. born SIV		
U.S. born VOT		
U.S. born AMR		
U.S. born AHP		
U.S. born UHP		
Temporary Housing Type Acceptable Values	Public Comment	ORR Response
With Sponsor	One commenter asked if they should understand the term “sponsor” in the legal sense of the word (e.g., the sponsor has filed an I-134)? In other words, is a U.S. tie a “non-sponsor”?	The term “Sponsor” here is used broadly to mean a sponsor, relative, or friend. Instructions have been updated to reflect this. (Note, ORR does not use the term “US tie” with regard to its programming.)
With Non-Sponsor		
AirBnB		
Hotel		
Homeless Shelter		
Domestic Violence Shelter		
Transitional Shelter		
Sponsor Financed Housing		
Occupation Categories Acceptable Values	Public Comment	ORR Response
Management Occupations	One commenter suggested that this list is too short and recommends including an “Other” option with the ability to provide an explanation.	This is not a list of occupations. It is the Department of Labor (DoL) list of occupation categories. Each category includes many individual occupations, for over 800 occupations total. Please refer to the DoL list here to identify individual occupations within these categories: List of SOC Occupations (bls.gov) . Adding an “Other” category will result in non-comparable data. As such, ORR intends to retain this list.
Business and Financial Operations Occupations		
Computer and Mathematical Occupations		
Architecture and Engineering Occupations		
Life, Physical, and Social Science Occupations		
Community and Social Service Occupations		
Legal Occupations		
Educational Instruction and Library Occupations		
Arts, Design, Entertainment, Sports, and Media Occupations		
Healthcare Practitioners and Technical Occupations		
Healthcare Support Occupations		
Protective Service Occupations		
Food Preparation and Serving Related Occupations		
Building and Grounds Cleaning and Maintenance Occupations		
Personal Care and Service Occupations		
Sales and Related Occupations		
Office and Administrative Support Occupations		
Farming, Fishing, and Forestry Occupations		
Construction and Extraction Occupations		
Installation, Maintenance, and Repair Occupations		
Production Occupations		
Transportation and Material Moving Occupations		
Various Client Information Form Fields Acceptable Values	Public Comment	ORR Response

	<p>One commenter suggested that some data fields proposed do not fit the MG program for all clients, such as collecting information around temporary housing versus long-term housing. They also asked if fields will have drop down answers, to ensure uniformity and if dates for EAD, Social Security Card, SNAP, temporary housing, long-term housing can be listed as “N/A.”</p>	<p>ORR has selected data fields that apply to Matching Grant clients generally. Housing is a requirement of the Matching Grant program, so housing status is relevant to all Matching Grant clients.</p> <p>There will be drop down menus for many fields. Responses for EAD, Social Security Card, SNAP applications, and housing type are required, but a response of N/A (non-applicable) is allowed, as outlined in the instructions. As also outlined in the instructions, respondents must provide a date for these activities if the activity is marked “Yes.”</p>
--	---	---