Refugee Support Services (RSS) and RSS Set-Aside Sub-Grantee List

OMB Information Collection Request
0970 - 0556

Supporting Statement Part A - Justification

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Type of Request: Revision

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

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval of an extension with no changes for an information collection. This collection requests Refugee Support Services (RSS) grantees and RSS Set-Aside grantees to provide the agency name, city, state, website, and funding amount for each contracted sub-grantee. Most RSS Grantees and RSS Set-Aside grantees sub-contract with sub-grantees to provide direct services to clients.

Information about sub-grantees is necessary for the Office of Refugee Resettlement (ORR) to identify which local agencies are receiving ORR funding through RSS and RSS Set-Aside funding as well as ORR's numerous discretionary grants which are funded directly by ORR. The information also allows ORR to share information other than the funding amount with federal partners who may make the information public. The information we make public includes state, city, sub-grantee, website, and program. Currently, as stated below, ORR only shares this publicly with Department of Labor for their "One Stop Career Center" program. This is relevant for programs with employability components: RSS and Youth Mentoring. Refugees, special immigrant visa holders, trafficking survivors, Cuban/Haitian Entrants, Amerasians, and asylees are all eligible for ORR Refugee Programs. Of all these different populations, ORR has continued to struggle to connect eligible individuals who are paroled and annually granted asylum to ORR services. Parolees and asylees often have to work independently to find services or with their immigration attorneys.

ORR also lists the Matching Grant (MG) sub-grantees (or local providers) on the Department of Labor website, but MG is only for individuals who have just received asylum within the past month and services only last for a total of six months. RSS employment services are for individuals within five years of obtaining asylum, so it is extremely beneficial to asylees and immigration attorneys to have these services all provided in one public location as well.

This information collection provides ORR with the data it needs for national resource mapping at the local level. In other words, it assists ORR in identifying agencies which receive ORR funding through numerous ORR sources. Local agencies may receive funding through ORR directly, through non-governmental organizations (NGOs) that receive ORR funding and sub-grant out the work, and through states or replacement designees. ORR used to collect this information for its discretionary grants but began collecting this information for formula RSS and RSS Set-Aside grantees when this form was initially approved in October 2020.

This information collection is related to and funded by Refugee Support Services, is authorized by the Refugee Act of 1980 [Immigration and Nationality Act, Title IV, Chapter 2 Section 412 (e)] and 45 CFR §400.28 and is being conducted by the ORR, Division of Refugee Assistance.

2. Purpose and Use of the Information Collection

Once a year, each RSS and RSS Set-Aside grantee complete a chart indicating the agency name, city, state, funding amount, and website of each contracted RSS and RSS Set-Aside sub-grantee.

The main purpose of the information collected through this report is to provide ORR with a complete picture of the availability of all ORR resources and to assist newly arrived refugees identify local service providers. The information collected is and will continue to be used for national resource mapping pertaining to ORR funding at the local level. ORR also uses the information to identify gaps or target areas of need. For example, ORR will be able to use this information to work with its partner at Department of State, Bureau of Population, Refugees, and Migration (PRM), to assist with appropriate placement planning. In accordance with the current administration's policy to expand the number refugees resettled into the U.S. in the coming years, PRM is looking to approve new locations for refugee resettlement agencies. If PRM has identified a new location where refugees are beginning to resettle, ORR can ensure that through its numerous funding streams, services can reach these clients.

Additionally, each year the Department of Labor requests information from ORR on local agencies providing employment services so that this information can be publicly made available on their website. ORR provides this list for Match Grant, RSS, and RSS Set-Aside sub-grantees that receive ORR funding. This is the only website where all employment services funded by ORR can be easily found and utilized by asylees or immigration attorneys who otherwise are not connected to ORR local service providers.

The Department of Labor website is the only one where an individual can find refugee relevant employment services anywhere in the country. Most local service providers who receive federal funds are publicly listed on various websites including some from ORR's website, some for national Resettlement Agencies, and state governments will often list their own service providers. For example, a map of agencies who are federally funded and provide Reception and Placement services funded by the Department of State as well as Matching Grant services funded by ORR is available at https://www.wrapsnet.org/documents/PRM-FY23-Affiliate-Sites.pdf. Additionally, ORR provides the list of grantees for all discretionary recipients like the Ethnic Community Self Help Program listed here: https://www.acf.hhs.gov/orr/policy-guidance/ethnic-community-self-help-grants.

3. Use of Improved Information Technology and Burden Reduction

RSS grantees complete the RSS and RSS Set-Aside Sub-Grantee List Form in the ORR Refugee Program's database system which is called: Refugee Arrivals Data System (RADS).

4. Efforts to Identify Duplication and Use of Similar Information

The information collected here was reviewed against other ORR forms and reports to ensure that this information is not collected elsewhere.

5. Impact on Small Businesses or Other Small Entities

We do not anticipate the involvement of small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

SRCs are required to provide this information once a year. RSS sub-grantees change often. Without an annual requirement, ORR will have no assurance of its data's accuracy, and therefore its ability to have a current national resource map.

As this information will be housed within ORR's database system, after the initial information is provided, only annual updates will be required to already existing information on the sub-grantees.

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

There are no special circumstances for the proposed data collection efforts.

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 April 22, 2024 (89 FR, 29340), and provided a sixty-day period for public comment. ORR did not receive any substantive comments.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

This information collection does not collect any personally identifiable or sensitive information. This information will be shared with other federal partners and may be made public.

11. Justification for Sensitive Questions

There are no sensitive questions in this data collection.

12. Estimates of Annualized Burden Hours and Costs

Estimated time per response is two hours per response for each of the 59 States and Replacement Designees, which includes development and submission of the report which is submitted annually.

Instrument	Total Number of Respondents	[1]Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Annual Cost
RSS and RSS Set-Aside Sub-grantee List	59	3	2	354	118	$42.54	$5,019.72

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2023, which is $21.27 per hour for state employees. To account for fringe benefits and overhead the rate was multiplied by two which is $42.54. The annual cost to respondents is estimated to be $5,019.72.
https://www.bls.gov/oes/current/oes211093.htm

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

There are no additional costs to respondents or record keepers.

14. Annualized Cost to the Federal Government

Instrument	Number of Respondents	Average Burden Federal Hours Per Review	Total Burden Hours Per Response	Average Hourly Wage	Total Annual Cost
RSS and RSS Set-Aside Sub-grantee List	59	3	177	$55.54	$9,831
Estimated Total Annualized Cost to the Federal Government					**$9,831**

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Management Analysts [13-1111] and wage data from May 2023, which is $55.54 per hour. The estimate of annualized cost to respondents for hour burden is $55.54 times 177 hours or $9,831. This total amount covers time and effort of staff to review, clarify and accept reports.

https://www.bls.gov/oes/current/oes131111.htm

15. Explanation for Program Changes or Adjustments

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[1] Total responses over a three-year period.

This is for an extension with no changes proposed to the information requested. Burden estimates have been updated to reflect the current number of expected respondents.

16. Plans for Tabulation and Publication and Project Time Schedule

ORR shares information (other than the funding amount) with our federal partners at Department of Labor's One Stop Career Center program upon their request which is typically in the spring each year. We share agency name, city, state, and website. We only share the Refugee Social Services sub-grantees and not our RSS Set-Aside programs who do not provide employment services. Additionally, as refugee arrivals increase, ORR may share this information with PRM to ensure that refugees resettled through their Remote Placement Program are aware of services in their area, if relevant.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.