Refugee Support Services Refugee Health Promotion Set-Aside Programs Assessment Guide

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for a Refugee Support Services (RSS) Refugee Health Promotion (RHP) Set-Aside Program Assessment.

Background

The Office of Refugee Resettlement (ORR) established the RSS RHP Set-Aside program in fiscal year (FY) 2020. The RHP Program funds recipients to promote the health and well-being of eligible populations through health literacy, health care coordination, and wellness groups. To accomplish these goals, recipients select from a list of allowable services in addition to the provision of required services, offering recipients the flexibility to design culturally responsive programs that meet participants' unique needs.

As ORR's programs and populations have expanded since the RHP program's inception, obtaining feedback about program design and implementation is necessary to ensure recipients are able to effectively deliver benefits and services to tens of thousands of eligible participants. ORR proposes an assessment of five states administering varying RHP service delivery models. The information will support ORR's efforts to develop program performance measures, enhance federal data-driven decision-making, and plan for the provision of programmatic or technical assistance.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

The RSS RHP Set-Aside Program Assessment is designed to hear from recipients and subrecipients, who administer and implement ORR programs, and program stakeholders, and clients. The purpose is to comprehensively understand how recipients and subrecipients design and implement their RHP programs and use RHP Program funds. Collected data will inform ORR's ongoing learning about challenges and opportunities with the federal guidance and policy parameters within which recipients and subrecipients currently design and implement programs across the country.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Obtaining feedback about processes and/or practices to inform ACF program development or support.

- Obtaining input on the development of program performance measures (PM) from grantees or experts in a relevant field (such as development of PMs for youth-focused programs).
- Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).

Learning Questions

The key learning questions this assessment aims to answer are:
- How do recipients and subrecipients design and implement their RHP programs?
- How are recipients and subrecipients utilizing RHP Program funds?

Assessment Design

The RSS RHP Set-Aside Program Assessment will conduct semi-structured interviews and focus groups with RHP recipient staff, RHP subrecipient staff, and RHP clients. These activities will enable ORR to directly hear clients' experience of RHP services and perspectives of service providers relevant stakeholders.

Using a qualitative approach enables ORR to obtain information about the RHP Program and grantee processes or needs without consuming excessive amounts of recipient time with the administrative tasks involved in a typical monitoring review. Moreover, this approach enables timely feedback from recipients, subrecipients, clients, and other stakeholders that can inform changes and improvements to RHP programs and services.

ORR will collect data in five states that represent a range of geographies, RHP funding levels, and RHP service delivery models. ORR expects to engage the following states: Alabama, Arizona, Minnesota, New Mexico, and Texas.

Data Collection Activity	Instruments	Respondent, Content, Purpose of Collection	Mode and Duration
Interviews with state/replacement designee (RD) staff	1 – RSS Set-Asides Assessment Refugee Health Promotion State Refugee Health Coordinator Interview Guide	**Respondents**: The state refugee coordinator, state refugee health coordinator, or replacement designee assigned in each state. **Content**: Questions about RHP services within a state; challenges and opportunities with formal program development; and partnership with subrecipients. **Purpose**: Gather information from service providers involved in the delivery of ORR program that can be used to make changes and improvements to ORR's programs and services.	**Mode**: Virtual **Duration**: 1 hour
Interviews with clients	2 - RSS Set-Asides Assessment Refugee	**Respondents**: RHP program participants.	**Mode**: Virtual

	Health Promotion Client Interview	**Content**: Questions about their program experience, challenges, and any unmet or ongoing needs.	**Duration**: 1 hour
		Purpose: Gather information from individuals enrolled in ORR program that can be used to make changes and improvements to ORR's programs and services.	
Focus groups with subrecipients	3 - RSS Set-Asides Assessment Refugee Health Promotion Local Provider Focus Group Guide	**Respondents**: Refugee service providers involved in the delivery the RHP program.	**Mode**: Virtual
		Content: Questions about experience in the design and delivery of the RHP program.	**Duration**: 1 hour
		Purpose: Gather information from service providers involved in the delivery of the RHP Program that can be used to make changes and improvements to ORR's programs and services.	

A3. Improved Information Technology to Reduce Burden

The focus groups and interviews will occur virtually. Using a virtual platform reduces the administrative burden on respondents.

A4. Efforts to Identify Duplication

ORR is sensitive to recipients' time constraints in the selected states. Data collection instruments were developed in coordination with other ORR data collection and reporting activities to avoid duplicative efforts, and respondents are not required to participate. ORR examined administrative data and collaborated with federal program subject matter experts to ensure that data collection activities are unique and unable to be fulfilled through any other existing channels.

A5. Involvement of Small Organizations

Within the states selected for this assessment, subrecipients (also referred to as local resettlement agencies or local providers) involved in the provision of services to RHP Program participants will be asked to participate in local provider focus groups. Subrecipients range in size and include small nonprofit organizations. All focus groups will be scheduled at times convenient for participants.

A6. Consequences of Less Frequent Data Collection

This assessment requires a one-time data collection effort to provide ORR with timely information related to services provided. Less frequent data collection would result in limited information on current challenges with program design and funding allocation structures. Limited information is available regarding stakeholder experience with program design and implementation, client experience with the program's services, and feedback regarding opportunities to enhance federal program administration.

A7. Special Circumstances

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

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

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 request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

Consultation with Experts Outside of the Study

ORR has not consulted with experts outside of the study.

A9. Tokens of Appreciation for Respondents

No tokens of appreciation for respondents are proposed for this information collection.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

ORR shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. ORR shall use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. ORR shall securely generate and manage encryption keys to prevent

unauthorized decryption of information, in accordance with the Federal Processing Standard. Data will be collected using only agency-issued laptop computers and any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.

To select respondents for the client interviews, ORR will work with State Refugee Coordinators (SRCs) and their RHP subrecipients to identify eligible clients enrolled in the RHP Program. Requests will be sent to 10 RHP clients (two per state). After the client consents to participate in the interview, SRCs will send names and contact information of relevant state agency staff and subrecipient staff serving those clients for ORR to send meeting invites for the interviews. Additionally, ORR is asking for the name and organization for RHP subrecipient program staff. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Estimated Burden and Costs

The annual burden hours total is calculated by the amount of time each respondent is asked to participate, as listed below.

- Ten clients will participate for up to one hour each, a total of ten hours.
- Five state refugee agency staff will participate for one hour each, a total of five hours.
- 70 subrecipients and stakeholders will participate for 1 hour each in focus group discussions, a total of 70 hours.

The estimated annual cost to program participants is calculated using the U.S. Department of Labor federal minimum wage of $7.25.[1] To account for fringe benefits and overhead, the rate was multiplied by two, totaling $14.50.

The estimated annual cost to respondents from RHP subrecipients, state refugee agency or replacement designee staff, and other RHP service providers is calculated using the U.S. Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2023[2] which is $21.27 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, totaling $42.54 per hour.

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[1] U.S. Department of Labor, *Minimum Wage*, https://www.dol.gov/general/topic/wages/minimumwage (last visited August 15, 2024).

[2] U.S. Bureau of Labor Statistics, Occupational EmploRHPent and Wages, May 2023, 21-1093 Social and Human Service Assistants, https://www.bls.gov/oes/current/oes211093.htm (last visited August 2, 2024).

Instrument	Total Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
1 – RSS Set-Asides Assessment Refugee Health Promotion State Refugee Health Coordinator Interview Guide	5	1	1	5	42.54	$212.70
2 - RSS Set-Asides Assessment Refugee Health Promotion Client Interview	10	1	1	10	14.50	$140.00
3 - RSS Set-Asides Assessment Refugee Health Promotion Local Provider Focus Group Guide	70	1	1	70	42.54	$2,977.00
Total Burden and Cost Estimates:				**85**		**$3,330.50**

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The total cost to the federal government for the data collection activities under this current request will be $3,330.50.

A15. Change in Burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Data collection will occur following OMB approval, for about two months. Focus group and interview data will be analyzed using the qualitative software program NVivo. Upon completion of data collection and analysis, a report detailing the assessment findings will be developed for ORR Division Directors and Program Officers. This report is expected to be completed in Quarter 2 of FY 2025. The report is for internal planning and programmatic purposes and not for any kind of public dissemination, even if deidentified.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

Attachments:

1. QUEST_RHP SRHC Interview
2. QUEST_RHP Client Questionnaire
3. QUEST_RHP Local Provider Guide