

# **Immigration Legal Service for Afghan Arrivals – Training Experience Survey and Topic-Based Knowledge Assessment**

**Formative Data Collections for Program Support**

**0970 – 0531**

## **Supporting Statement**

### **Part A - Justification**

**June 2023**

Submitted By:  
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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 two information collections that support the Office of Refugee Resettlement (ORR) to ensure Eligible Arriving Afghans (EAA) across the country receive legal services from qualified providers as part of ORR's Immigration Legal Services for Afghan Arrivals (ILSAA) program. These collections will provide ORR with information about participating legal service providers' (LSP) experiences and knowledge to support matching of qualifications to individual's legal service needs and inform the provision of tailored training to legal service providers in key topical areas.

### ***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***

**Training Experience Survey:** The purpose of this instrument is to gather details about participating LSPs' previous experience with immigration law. It will be administered to all LSPs joining the ILSAA network once they are vetted and approved to provide services to EAAs. This survey will support ensuring that LSPs have adequate previous experience. If an LSP does not have experience in a specific area, they will be provided training on that topic.

**Topic-Based Knowledge Assessment:** The purpose of this instrument is to assess knowledge in key topic areas LSPs will likely encounter in assigned ILSAA cases. The information obtained from the assessment will help ILSAA staff determine any knowledge gaps and where the provider may need additional training to be adequately prepared in key areas prior to case assignment.

Together these forms will provide ORR's ILSAA with information necessary to provide needed support to LSPs to ensure EAAs have access to qualified providers. Specifically, ILSAA will use the information to provide additional training that providers need around key topics to provide high quality support to EAAs and to ensure LSPs with appropriate prior experiences are available to EAAs.

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

- Delivery of training or technical assistance (TA) related to program implementation.
- Planning for provision of programmatic T/TA.

### ***Processes for Information Collection***

The Training Experience Survey will be sent as a PDF form via email to newly approved and vetted LSPs. This will be done on a rolling basis as providers join ILSAA. Once returned, ILSAA staff review the LSP's prior experience and provide a tailored Topic-Based Assessment for areas where they have prior experience and provide training for areas where they do not have prior experience.

The tailored Topic-Based Knowledge Assessment will be sent via email to LSPs after they have completed the Training Experience Survey. Once ILSAA's Learning Management System (LMS) is implemented, the Topic-Based Assessment will be provided and completed within the LMS. If the LSP successfully completes the assessment, they will start providing services to EAAs. If they do not successfully complete the assessment, they will be provided with additional training prior to providing services to EAAs on behalf of ILSAA. This is to support efforts to provide high quality services to EAAs on behalf of ILSAA.

### **A3. Improved Information Technology to Reduce Burden**

The Training Experience Survey and Topic-Based Knowledge Assessment will be sent through email to be electronically completed.

### **A4. Efforts to Identify Duplication**

No other data collection exists that provides the specific information about LSP knowledge and experience needed for ILSAA to provide appropriate support.

### **A5. Involvement of Small Organizations**

LSPs may include small businesses. The collection is online and of minimal burden to give only the information necessary to ensure that the LSPs are qualified to provide service prior to referrals.

### **A6. Consequences of Less Frequent Data Collection**

This is a one-time data collection.

### **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 Outside Experts***

No consultations have taken place with experts outside of the project team.

### **A9. Tokens of Appreciation for Respondents**

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

### **A10. Privacy of Respondents**

LSP name, organization, email address, and phone number will be collected on the Training Experience Survey for the purpose of communicating with the LSP regarding their results and training to be provided. No additional personally identifiable information (PII) will be collected on the Topic-Based Knowledge Assessment.

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data including use of data to inform assignment of cases to them for service provision based on their experience and knowledge. Any PII will be removed prior to analysis for aggregation or summary reporting.

### **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

### **A12. Estimation of Information Collection Burden**

#### ***Burden Estimates***

Burden for the Training Experience Survey was calculated based on an estimate of 60 LSPs and the time it would take an individual LSP to take the survey and provide response. Each instrument was completed by fewer than 10 ILSAA staff to determine a realistic estimate of the expected time for respondents to complete.

The burden calculation for the Topic-Based Knowledge Assessment was calculated based on an estimate of 60 LSPs and the time it would take one LSP to complete the assessment and submit. Each instrument was completed by fewer than 10 ILSAA staff to determine a realistic estimate of the expected time for respondents to complete.

**Cost Estimates**

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Lawyers [23-1011] and wage data from May 2022, which is \$78.74 per hour. To account for fringe benefits and overhead the rate was multiplied by two, which is \$157.48.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
ILSAA Training Experience Survey	60	1	0.2	12	\$157.48	\$1,889.76
ILSAA Topic-Based Knowledge Assessment	60	1	1.083	65	\$157.48	\$10,236.20
Totals:	60	2	Avg: .642 per response	77	\$157.48	\$12,126

**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 for the data collection activities under this current request will be \$2,054.00.

**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**

Information will be collected on a rolling basis while ILSAA is providing support under contract to ACF. ILSAA and ACF will use information collected for planning purposes and to support improved service provision to EAAs.

Information may be incorporated into documents that are made public, for example in project specific reports and infographics for the ILSAA project to relevant federal leadership, staff and local implementing agencies aligned with contract reporting requirements or when needed to facilitate service provision to EAAs.

**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**

- Information Collection: Training Experience Survey
- Information Collection: Topic-Based Knowledge Assessment