

# **Immigration Legal Services for Afghan Arrivals – Technical Assistance Interest Form**

**Formative Data Collections for Program Support**

**0970 – 0531**

## **Supporting Statement**

### **Part A - Justification**

**October 2023**

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

4<sup>th</sup> Floor, Mary E. Switzer Building  
330 C Street, SW  
Washington, D.C. 20201

## **A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) Office of Refugee Resettlement (ORR) at the U.S. Department of Health and Human Services (HHS) seeks approval to collect feedback about Legal Service Providers (LSP) and State Refugee Coordinators (SRC) technical assistance (TA) needs.

### ***Background***

Immigration Legal Services for Afghan Arrivals (ILSAA) is funded by ORR and implemented by the U.S. Committee for Refugees and Immigrants (USCRI) and ICF. ORR is dedicated to providing new populations with the opportunity to achieve their full potential in the United States. Broadly, ORR's programs provide people in need with critical resources to assist them in becoming integrated members of American society. More specifically, ILSAA provides immigration legal services to Eligible Afghan Arrivals (EAAs) across the country and helps build the capacity of immigration LSPs. This includes TA for LSPs and SRCs. This information will support ORR's efforts to ensure LSPs and SRCs have access to and receive appropriate training, support, or products related to the ILSAA project.

### ***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 *ILSAA Technical Assistance Interest Form* is designed for LSPs, SRCs, and others to provide information about their technical assistance needs, such as training, support, or products related to the ILSAA project. The information provided will inform ILSAA TA materials and support processes. ILSAA will use the information to support program improvement by ensuring information, resources, and materials and supports are accurate, high-quality, and meet the needs of LSPs and SRCs, and to provide TA to those who indicate a need in a timely manner. Only ILSAA staff will review and summarize the Technical Assistance Requests Forms.

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 technical assistance needs (support, training, or products) to inform ACF program support.

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

LSPs and SRCs will complete the form on the ILSAA Peer Networking Hub to provide details about their technical assistance needs. The ILSAA Team will review the information on the completed forms. Information will be used to inform updates to materials and assistance plans, and to provide materials and assistance to the respondent, as appropriate.

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

The *ILSAA Technical Assistance Interest Form* will be completed electronically and includes the key questions to determine what type of technical assistance is needed such as training, support, or products related to the ILSAA project. It is expected to take no more than eight minutes to complete.

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

No other data collection exists that provides the specific information about technical assistance needed for ILSAA to provide appropriate support.

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

The collection will involve small organizations including LSPs and SRCs. Due to the nature of this form the small organization can choose to fill out the response at any time.

### **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**

Information collected will be kept private. Personally Identifiable Information will be used to contact respondents to offer TA services. Respondents will be informed of all planned uses of data including use of data to determine what technical assistance they may need, how the ILSAA project can aid in the request, follow up with them, and to inform improvements to these support services.

### **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

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

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

We anticipate about 30 individuals will complete the TA Interest Form 4 times per year and expect it to take about 8 minutes to complete.

#### ***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Legal Occupations [23-0000] and wage data from May 2022, which is \$59.87 per hour. To account for fringe benefits and overhead the rate was multiplied by two, which is \$119.64.

Source: [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 Technical Assistance Interest Form	30	4	0.13	15.6	\$119.64	\$1866.38

### **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 \$1975.

**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.

The information provided in the TA request will solely be used by the ILSAA staff to understand the content being requested to provide the applicable materials. The information provided in the TA request form will not be publicly used.

**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: Immigration Legal Services for Afghan Arrivals (ILSAA) Technical Assistance Interest Form