

Unaccompanied Children Program Care Providers Education Services Survey

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

May 2024

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 to collect information about current education programming across the Office of Refugee Resettlement (ORR) Unaccompanied Children (UC) Program. This information will be fundamental to informing efforts to refine UC Program guidance and procedures to ensure delivery of high-quality education services.

As a result of generalized policy and guidance on education, care providers have interpreted the education requirements and responsibilities in a variety of ways, producing both innovative solutions and programs that meet only the minimum requirements. ORR seeks to learn more about how education services are currently being provided to identify best practices, common challenges, and improve education programming across our network of care providers and grantees, with the intent to provide more meaningful education programming that will better prepare unaccompanied children for academic success once they are released from ORR care and custody.

This data collection is part of a larger project to develop ORR guidance, procedures, and technical assistance to improve education outcomes of unaccompanied children.

Background

The UC Program provides education services to all unaccompanied children in its care. Grantees and contractors must meet the requirements of UC Policy Guide Section 3.3.5, which requires care providers to offer structured classroom education five days per week, six hours per day, “throughout the entire year in basic academic areas (Science, Social Studies, Math, Reading, Writing, Physical Education, and English as a Second Language (ESL), if applicable).” Aside from minimal instructions on some allowable variations to this requirement, as well as allowances for certain children to be enrolled in and attend local schools, ORR’s UC Program has not released comprehensive guidance on education services.

ORR seeks to improve the education programming provided by grantee and contract care providers administering the UC program through clear and reasonable guidance. There is a current lack of understanding of what education programming is provided across the UC Program and how education services are delivered to inform guidance and procedure development to strengthen program quality and effectiveness.

The proposed survey is part of a larger project to better understand program needs for implementing and improving education services. This survey will provide a baseline inventory of existing services and delivery methods.

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 survey will identify existing educational services and delivery methods for providing education programming. Information will be used for internal planning purposes by the UC Policy Team and Child Services Team to inform their efforts to improve guidance and support for grantee and contract care providers.

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

1. Delivery of training or technical assistance (TA) and workflows related to program implementation and the development or refinement of program and grantee processes.

Specifically, the data collected in this survey, along with additional supporting work done by the UC Policy Team, will help to identify areas where grantee and contract care providers need additional guidance and support related to the delivery of education services. The data provided may lead to TA for existing and new policy guidance and procedures.

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

Specifically, this survey will help prioritize education issues and enable UC Policy update its guidance to meet the most immediate needs of the programs and the children they serve.

Processes for Information Collection

The survey will be sent to the UC Program care providers through the UC Policy Resource Box email account and promoted via monthly ACF Care Provider calls.

The survey will be voluntary and targeted to care provider Education Leads, or equivalent, with a goal of at least 169 respondents. (169 = n with 5% margin of error). See Supporting Statement B for additional information on the target respondent population and response rates and data quality.

Participants will be asked to respond through a web-based survey.

A3. Improved Information Technology to Reduce Burden

The survey will be administered using a web-based survey.

A4. Efforts to Identify Duplication

This is the first information collection on education programming in the UC Program. No other information of this kind has been collected or is available.

A5. Involvement of Small Organizations

Respondents will not include small organizations.

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

This information collection has been informed by internal staff within the UC program.

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.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Respondents will have the option to include their name and contact information for follow up purposes.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

The survey is intended to take 30 minutes or less. It is estimated that 169 respondents will complete the survey.

Cost Estimates

The estimated average wage was calculated using a list of all reported Education Lead (or equivalent) salaries in 2023. The average salary was \$71,925. This was multiplied by 2 (\$143,850) to account for fringe benefits and overhead and then an hourly wage estimate (\$69.16) was calculated based on that.

| 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 |
|---------------------------|-----------------------------|--|-----------------------------------|--------------------|---------------------|-------------------|
| Education Services Survey | 169 | 1 | .5 | 84.5 | \$ 69.16 | \$5844.02 |

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 \$4,250.60.

Two federal employees will collect, analyze, and present the survey data. The wage was calculated using the current wages of the staff assigned to the project. The wages were multiplied by 2 to account for fringe benefits and overhead.

| Employee | Total Burden Hours | Hourly Wage | Total Annual Cost |
|---|--------------------|-----------------------|-------------------|
| Data Analyst (GS9 Step 1) (Atlanta) | 20 | \$13.01 x 2= \$26.02 | \$520.40 |
| Procedures Analyst (GS13 Step 4) (WDC) | 30 | \$62.17 x 2= \$124.34 | \$3,730.20 |
| TOTAL | | | \$4,250.60 |

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

The survey will be released for a two-week response period which will begin at the next care provider phone call following OMB approval.

Responses will be analyzed and presented internally with recommendations for policy improvements. This information may be shared in the form of presentations and decision memos. Some results may be shared as part of technical assistance to demonstrate the rationale for covering a certain topic from the survey.

The information collected will **not** be published publicly.

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

UC Program Education Services Survey