

**Office of Refugee Resettlement
Unaccompanied Children Bureau
Normalcy Integration Survey**

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

August 2024

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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 gather information on the Unaccompanied Children Bureau's (UC Bureau) understanding and application of normalcy by surveying staff from the Bureau and the care provider network.

Background

The Bureau within the Office of Refugee Resettlement (ORR) does not have a Bureau-wide definition of normalcy. This lack of a Bureau-wide definition conflicts with child welfare best practices in the domestic system since the passage of the *Preventing Sex Trafficking and Strengthening Families Act*, in 2014. During engagement with Bureau teams and care provider partners, the Bureau has learned that there are apprehensions and misunderstandings regarding the allowability and application of normalcy principles for the unaccompanied children population. This is especially the case for children placed in congregate settings, such as shelters. ORR plans to develop a Bureau-wide definition of normalcy. The Bureau's working definition ensures an unaccompanied child's range of experiences while in ORR custody is typical of the range of experiences of any child of the same age. The working definition tailors application to the age, developmental stage, and interests of the child. The survey asks respondents to evaluate specific normalcy examples, such as cell phone ownership and independent travel to community resources (e.g., public library). Prior to finalizing the definition, ORR leadership first wants to understand the extent of staff and providers' attitudes and apprehensions with integrating normalcy principals and their operational impacts.

Therefore, ORR plans to survey Bureau and care provider staff on how they interpret and apply normalcy principles. The Bureau will use this feedback to develop a communications plan to solicit buy-in from Bureau staff and care provider partners. The communications plan will respond to their concerns and questions about normalcy and its impacts on programming and potential liability for providers. Survey results will also inform the development of training and technical assistance materials. The survey is the most appropriate means for gathering this relevant information.

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 purpose of the ORR Unaccompanied Children Bureau Normalcy Integration Survey is to inform the Bureau's efforts to develop a Bureau-wide definition of normalcy. The Bureau will use the information to inform the creation of a communications plan and training and technical assistance materials on integrating normalcy principles. The goal is that staff understand

normalcy as a way to prepare children for post-release and as a protective factor to keep children safe from abuse, maltreatment, and other forms of exploitation.

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 and/or workflows related to program implementation. This could include the development and refinement of communication systems.
- Planning for provision of programmatic or evaluation-related training or technical assistance regarding normalcy principles and their application by Bureau care providers.
- Obtaining feedback about processes and/or practices to inform ACF program development or support. ACF will analyze the information obtained to determine how best to integrate normalcy principles across all Bureau care providers.

Processes for Information Collection

ORR will administer the ORR Unaccompanied Children Bureau Normalcy Integration Survey using an online platform, such as Qualtrics. The survey is expected to take about 30 minutes and will be sent to all staff within the Bureau and its care provider network. These contacts include Program Directors, Case Managers, Clinicians, and Youth Care Workers, among others. Much of the care provider workforce is Spanish speaking, so the survey will be available in English and Spanish to maximize participation.

ORR will announce the survey during one of its monthly Provider Calls to be followed by an email announcement. The email announcement will outline the perceived benefit for the Bureau, assure respondents their anonymity will be maintained, and specify a 14-day deadline for completion.

Survey results will be anonymous. However, the Bureau wants to compare results between three distinct groups: i. Bureau staff, ii. Congregate care provider staff (e.g., shelters), and iii. Foster care provider staff (e.g., transitional and long-term foster care). Therefore, ORR will issue the survey to separate distribution lists for each group. That way, results can be analyzed by group while maintaining anonymity.

A3. Improved Information Technology to Reduce Burden

The survey will be announced during a monthly Provider Call. Those calls are facilitated via Zoom. Following the call, ORR will issue an email announcement to all contacts in its Project Management Tool. The survey itself will be administered in English and Spanish, via Qualtrics.

A4. Efforts to Identify Duplication

The information being collected is not obtainable from other sources.

A5. Involvement of Small Organizations

No small businesses will be involved with this information collection.

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

The survey was developed in consultation with Cristina Cooper, Senior Attorney, Annie E. Casey Foundation. Over the past few years, Annie E. Casey Foundation has partnered with ORR to advance child welfare best practices, such as youth engagement, community-based care, and normalcy. Cristina has prior experiencing consulting for ORR, as she supported ORR's community-based care work.

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. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private. Personally identifiable information (PII) will not be collected.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

The total ORR care provider network consists of 36,000 contacts. ORR estimates a response rate of about 10 percent, for a total number of 3,600 respondents. Respondents will complete the survey once, and the estimated time to complete the survey is 30 minutes.

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Child, Family, and School Social Workers [21-1021] and wage data from May 2023, which is \$28.46 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$56.92.

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
ORR Unaccompanied Children Bureau Normalcy Survey	3,600	1	0.5	1,800	\$56.92	\$102,456

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 \$3,611.20.

Employee	Total Burden Hours	Hourly Wage	Total Annual Cost
Data Analyst (GS12 Step 1) (WDC)	20	\$45.14 x 2= \$90.28	\$1,805.60
Data Analyst (GS12 Step 1) (WDC)	20	\$45.14 x 2= \$90.28	\$1,805.60
TOTAL			\$3,611.20

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 announced during ORR’s Monthly Provider Call, either in August or September 2024, pending OMB approval. That week, ORR will issue an email reminder and the survey tool. Respondents will have 14 days to complete the survey.

ORR will analyze results across three groups: i. Unaccompanied Children Bureau staff, ii. Congregate Care Provider staff, and iii. Foster Care Provider staff. Between Qualtrics and manual review by Data Analysts, analysis is anticipated to take five days. Following the analysis, ORR will develop a communications plan to target different teams and positions on their apprehensions, successes, and questions regarding normalcy principles. Training and technical assistance materials will accompany the targeted outreach, as well as for continued integration of normalcy principles into the Bureau.

The actual timeline will depend on when OMB approval is received, along any additional factors that may affect timing.

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

- A. ORR UCB Normalcy Integration Survey
- B. ORR UCB Normalcy Integration Survey Spanish