

**Stakeholder Listening Sessions to Support the
Development of the Unaccompanied Children
Office of the Ombuds (UCOO)**

**Administration for Children and Families
Generic for Engagement Efforts**

0970 – 0630

Supporting Statement Part A

Justification

September 2024

Submitted By:
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A1. Necessity for the Data Collection

The Unaccompanied Children Office of the Ombuds (UCOO), in the Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) proposes to collect information from stakeholders at in-person and virtual listening sessions to inform the ongoing development of UCOO's programs, policies, and operations.

Background

UCOO was established under the Unaccompanied Children Program Foundational Rule which became effective July 1, 2024. The office is independent of ORR and located in the Immediate Office of the Assistant Secretary (IOAS). It provides oversight to the Unaccompanied Children Bureau in ORR for concerns raised by unaccompanied children and stakeholders about ORR's care of unaccompanied children, policies, and/or procedures. Individuals can raise their concern to UCOO by filling out an intake form or sending the office an email. As a new office, feedback from stakeholders will be important as UCOO develops the office policies, operations, and associated information collections. The information requested at these proposed in-person and virtual listening sessions will inform the ongoing development of UCOO's programs, policies, and operations.

Legal or Administrative Requirements that Necessitate the Collection

The final rule establishing UCOO went into effect on July 1, 2024 and established the impartial office with authority to receive reports, including confidential and informal reports, of concerns regarding the care of unaccompanied children; to investigate such reports; to work collaboratively with ORR to potentially resolve such reports; and issue reports concerning its efforts.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

The primary purpose of this information collection is to further develop UCOO'S programs, policies, and operations to ensure that the office can effectively investigate the concerns that individuals raise about the care of unaccompanied children under the Unaccompanied Children (UC) Bureau in ORR.

The intended uses of the information include applying the feedback to inform the development of processes and procedures as UCOO builds out its office and its policies and ramps up its operations. For instance, feedback received from these sessions will:

- Help inform the development of processes and procedures related to investigatory actions involving the UC Bureau in ORR and other relevant agencies and otherwise how UCOO can best address concerns that individuals raise with the office.
- Inform the future iteration of the UCOO intake form, especially as it pertains to user friendliness and accessibility of the form.
- Help UCOO to understand stakeholder needs and interests to better tailor its annual and other reports, as well as its website, in accordance with the types of information that stakeholders would find most useful, as appropriate and within the scope and authorities of the UCOO.

This proposed information collection meets the goals and uses of the ACF generic clearance for engagement efforts (0970-0630):

- Gathering information from individuals with diverse experiences and perspectives to inform ACF policies and programs.
- Exploring emerging areas
- Informing program improvements
- Informing program planning
- Informing planning for new funding
- Informing program implementation
- Informing the development and dissemination of resources and products developed under ACF studies, regulatory activities, guidance, outreach and/or training activities, such as the type of reports that the UCOO publishes that would be most beneficial to stakeholders and/or the types of content the UCOO should include on its website.

Overview of Information Collections

Information Collection Title	Respondent, Content, Purpose of Collection	Mode and Duration
Listening Session for Unaccompanied Children and Sponsors	<p>Respondents: Unaccompanied children and sponsors.</p> <p>Content: Feedback will be collected on topics including, but not limited to, user friendliness of web materials, the intake form, and office operations.</p> <p>Purpose: To collect feedback about UCOO’s programs, operations, and policies to inform the office’s developments in this area.</p>	<p>Mode: Web (Zoom)</p> <p>Duration: 1 Hour</p>
Listening Session for Professional Organizations	<p>Respondents: Representatives from relevant professional organizations. These organizations may include, but are not limited to, non-profit organizations and charities whose missions and goals are aimed at supporting unaccompanied children and their sponsors</p> <p>Content: Feedback will be collected on topics including, but not limited to, user friendliness of web materials, the intake form, and office operations.</p> <p>Purpose: To collect feedback about UCOO’s programs, operations, and policies to inform the office’s developments in this area</p>	<p>Mode: Web (Zoom)</p> <p>Duration: 1 Hour</p>
Listening Session for Foreign Embassies	<p>Respondents: Representatives from relevant foreign Embassies</p>	<p>Mode: In-person (Washington DC)</p>

	<p>Content: Feedback will be collected on topics including, but not limited to, user friendliness of web materials, the intake form, and office operations.</p> <p>Purpose: To collect feedback about UCOO's programs, operations, and policies to inform the office's developments in this area</p>	<p>Duration: 1 Hour</p>
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Post Listening Session Surveys for all Participants	<p>Respondents: All participants who engaged in one of the above listening sessions with the UCOO</p> <p>Content: Anonymous feedback will be collected on a few, key topics such as whether the respondent has any additional input that they were unable to share during the session or whether there are areas that were not discussed during the listening session that they want to raise for UCOO's awareness or consideration related to the office's programs, policies, or operations</p> <p>Purpose: To ensure that all stakeholders/participants have an opportunity to provide timely, direct, and private feedback to the UCOO</p>	<p>Mode: Virtual</p> <p>Duration: 5 minutes</p>

Processes for Information Collection

UCOO will get a stakeholder list from the UC Bureau in ORR. Prior to each listening session, a reminder email will be sent to session participants, including the Zoom link. During each listening session, UCOO staff will have specific topics to present and request feedback on. UCOO staff will take meeting minutes and send a post-meeting survey to ensure high-quality listening sessions. UCOO staff will discuss the meeting minutes and post-meeting survey data and identify how to apply findings to UCOO's programs, policies, and operations.

A3. Improved Information Technology to Reduce Burden

UCOO will communicate with stakeholders by email to send meeting invitations and will disseminate post-meeting surveys through Microsoft Forms to session participants at the end of each listening session.

A4. Efforts to Identify Duplication

Currently, no formal process in the federal government exists for individuals to raise any concerns about the UC Bureau in the Office of Refugee Resettlement to a neutral, independent oversight body and to provide feedback regarding the process. This feedback is critical to continue building out UCOO and optimize its investigatory and reporting actions.

A5. Involvement of Small Organizations

UCOO will make its best efforts to schedule listening sessions at times most convenient for meeting participants.

A6. Consequences of Less Frequent Data Collection

UCOO cannot effectively build out its office without the feedback and insight from stakeholders. Robust data collection is necessary to provide informed, data-driven recommendations to ORR about the UC Bureau. Collecting data in the proposed way will allow the office to do this.

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 for a new umbrella generic clearance. The notice was published on December 11, 2023, (88 FR 85890), 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 (89 FR 12352), 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.

A9. Tokens of Appreciation for Respondents

It is extremely important to provide those with lived experience, experts, staff, and others providing their feedback for these efforts with equitable compensation or tokens of appreciation for participation. As noted in a 2022 report by the Office of the Assistant Secretary for Planning and Evaluation¹ this “helps ensure a diverse population with varied views can participate.”

UCOO will offer tokens of appreciation in the amount of \$75 to individuals with lived experiences, such as unaccompanied children, their families and/or sponsors, following each one-hour listening session that they participate in. UCOO believes this token of appreciation demonstrates meaningful recognition for participants’ time and input and will allow for more robust participation. UCOO is aware that participants may need to adjust work or other schedules or obligations to participate, and this token of appreciation could help to offset those costs.

As such, we plan to provide tokens of appreciation in the following amounts:

Information Collection	Time to Complete	Token of Appreciation
Listening session for individuals with lived experiences	1 Hour	\$75

Proposing equitable compensation is in line with leading practices for ethical engagement of those with lived expertise and advancing equity for populations who have been historically underserved (as noted in section A1, advancing equity is a priority, as highlighted in the referenced EOs in that section). Providing equitable compensation recognizes the value of the time provided by participants, helps to remove barriers to participation, and affirms that the contributions from those with lived experience are as valuable as those from other experts. The Teachers College of Columbia University states that researchers should consider the risk of coercion when offering tokens of appreciation to studies participants ([Tips for Compensating Research Participants](#)). To mitigate this issue, the UCOO will highlight the purpose of the listening session in all recruitment materials and will note the offerings of tokens of appreciation in secondary or smaller print text. In addition, the UCOO will work with community-based organizations to help spread the word to unaccompanied children and their families or sponsors about the listening sessions. UCOO believes that having the information about the listening sessions come from a trusted source of information that is not a governmental entity will also reduce the risk of coercion.

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.

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Information will be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

Generally, UCOO will ask open-ended questions about web content, the ease of raising concerns to the office, and about the office's programs and policies. UCOO believes that while these topics are not sensitive, some stakeholders may talk about their lived experiences related to the UC Bureau, which may be sensitive information. This information may be critical to share to have robust qualitative findings to inform program, operational, and policy changes in UCOO and recommendations to relevant agencies. UCOO will ensure stakeholders that their identity will be kept private, that sharing sensitive information is optional, and they will be informed of all planned uses of data.

A12. Estimation of Information Collection Burden

Burden Estimates

The number of respondents (25 per session) is based on UCOO's staff previous experience with stakeholder listening sessions with these populations. To effectively build out the office over the next year, UCOO anticipates that 4 virtual and 3 in-person listening sessions will be needed. Given the content and questions that will be asked, UCOO anticipates that each listening session will take 1 hour.

Cost Estimates

The cost to respondents was calculated using three different Bureau of Labor Statistics (BLS) job codes. For professional organizations, we used BLS job code 00-0000 and mean hourly wage data from May 2023, which is \$31.48 per hour (\$62.96 after fringe benefits). For UCs and their sponsors, we used BLS job code 21-0000 and mean hourly wage data from May 2023 which is \$28.36 (\$56.72 after fringe benefits). For foreign Embassies, we used BLS job code 23-0000 and mean hourly wage data from May 2024 which is \$64.34 (\$128.68 after fringe benefits).

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
Listening Session for Professional Organizations	50	1	1	50	\$62.96	\$3,148
Listening Session for Unaccompanied Children and Sponsors	50	1	1	50	\$56.72	\$2,836
Listening Session for Foreign Embassies	50	1	1	50	\$128.68	\$6,434
Listening Session for Professional Organizations	25	1	1	25	\$62.96	\$1,574

Post Listening Session Survey – Professional Organizations	75	1	0.08	6	\$62.96	\$377.76
Post Listening Session Survey – Unaccompanied Children and Sponsors	50	1	0.08	4	\$56.72	\$226.88
Post Listening Session Survey - Foreign Embassies	50	1	0.08	4	\$128.68	\$514.72
Total Burden and Cost Estimates	175	1	1.08	189		\$14,955.36

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 \$16,123.

A15. Change in Burden

This is for an individual information collection under the umbrella generic clearance for ACF engagement activities (0970-0630).

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

UCOO anticipates beginning listening sessions in the fall of 2024. The office anticipates hosting 4 virtual listening sessions and 3 in-person listening sessions over about 4-6 months. UCOO staff will prepare meeting agendas with relevant topics to get feedback on, develop a post-meeting survey to disseminate to meeting participants to ensure high-quality listening sessions, and will take meeting minutes to discuss internally after each listening session. Information collection may be used to inform the development, presentation, and/or types of content stakeholders would find useful in the UCOO’s annual reports that will be published and also sent to Congress , in addition to changes in UCOO’s programs, policies, and operations.

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

The listening session questions and the post-listening session survey questions are attached separately.