

Annual Survey of Refugees

**OMB Information Collection Request
0970 - 0033**

Supporting Statement Part A - Justification

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

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1. Circumstances Making the Collection of Information Necessary

The Annual Survey of Refugees (ASR) helps the Administration for Children and Families (ACF) Office of Refugee Resettlement (ORR) meet its congressional reporting requirements, as specified in The Refugee Act of 1980 (Section 413 of the Immigration and Naturalization Act, [8 U.S.C. 1523]).

Background

From the time of their arrival in the United States, refugees are eligible for social services, including means-tested public assistance, according to eligibility criteria established by the locality in which they are resettled. Following an initial 90-day reception period funded by the U.S. Department of State, ACF, through ORR, provides transitional resettlement assistance through a network of national non-profit grantees and their local affiliates. In many cases, these services are expected to end after an 8-month resettlement period. By that time, refugees are expected to be transitioned to mainstream social services or to self-sufficiency. The design of the resettlement program means that ORR has limited administrative information on refugees' experiences after the 8-month resettlement period.

The information collected through the ASR generates national population estimates of refugee labor force participation, public benefits receipt, English language acquisition, and conversion to legal permanent residency to meet Congressional reporting requirements. Given that ORR does not have access to cross-program administrative data on refugees' participation in state-provided services, a representative survey is the most resource-efficient way to meet ORR's annual reporting requirements, laid out in the Refugee Act of 1980.

In particular, descriptive information from the survey is used to meet the requirement of 413(b)(1): "an updated profile of the employment and labor force statistics for refugees who have entered the United States within the five-fiscal-year period immediately preceding the fiscal year within which the report is to be made." Descriptive information from the survey is also used alongside quantitative and qualitative data collected during program administration to meet the requirements of 413(b)(5): "the extent to which (A) the services provided under this chapter are assisting refugees in achieving economic self-sufficiency, achieving ability in English, and achieving employment commensurate with their skills and abilities."

This information collection request (ICR) includes revisions to the survey instrument intended to maximize the utility of the data collection, including for secondary analysis. There are no legal or administrative requirements necessitating the collection of these additional items. ACF is undertaking these revisions at the discretion of the agency. Proposed new items for ASR 2023-2025 are also flagged in Attachment A.

This request covers the following administrations of the ASR: ASR 2023 (to be fielded spring 2024), ASR 2024 (to be fielded spring 2025), and ASR 2025 (to be fielded spring 2026).

2. Purpose and Use of the Information Collection

Purpose and Use

As the only scientifically collected source of national information on the highly mobile and linguistically-diverse U.S. refugee population, the ASR has the potential to be a valuable source of information about the experiences of refugees during their first five years in the United States. As noted above, the purpose of the ASR is to gather national population estimates of refugee labor force participation, public benefits receipt, English language acquisition, and conversion to legal permanent residency. Information collected is used to meet the requirements laid out in the Refugee Act of 1980, to meet Congressional reporting requirements, and informs program planning, policy-making, and budgeting. Survey findings are also made available to the general public to provides context on refugee resettlement and help inform more responsive services and care to refugees.

To increase the utility of this routine data collection and improve the value of the ASR for the body of knowledge on ACF programs, the updated instrument described in this ICR is intended to collect rich information about a variety of factors that social science research indicates are related to refugee outcomes in self-sufficiency and well-being. This request includes updates that refine and/or revise the wording of questions and the addition of questions designed to collect more detailed data on refugee needs related to health, mental health, housing, transportation, and financial assistance. See Attachment A for information about specific changes.

Information from the ASR is not intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information.

Research Questions or Tests

The ASR instrument is designed to support national estimates of household demographics; human capital of family members 16 years and older; and economic self-sufficiency, including public benefits receipt. The study will also support multivariate analyses of the relationship between contextual factors and these outcomes. Table A1 summarizes what is measured in the ASR instrument, in two categories: domains estimated for the ORR Annual Report to Congress and contextual factors that research suggests are associated with resettlement outcomes.

Table A1. Estimates and Contextual Factors Measured in the Annual Survey of Refugees

Estimates for ORR Annual Report to Congress (8 U.S.C. 1523)
Estimates of employment and labor force statistics for refugees who have entered the United States within the five-fiscal-year period immediately preceding the fiscal year within which the report is to be made
Estimates of refugee self-sufficiency, achievement of English language proficiency, and employment commensurate with their skills and abilities
Applications for Legal Permanent Residence Status by Year of Arrival
Contextual Factors Potentially Associated with Resettlement Outcomes

Demographic information about refugee households
Experiences before and after arrival to the United States
Wellbeing and Social Connections to Receiving Community
Health Care Services
Engagement with Children's Schools

Study Design

The ASR's cross-sectional design was chosen to prioritize efficiency for use in statistical estimates of the characteristics and experiences of refugees entering the United States in the previous five fiscal years. The survey is fielded annually over a 13-week period from January-April.

One limitation of the design for its purpose is that each entering refugee cohort has its own demographic, cultural, and social characteristics. This means that outcomes for the oldest cohort of refugees (those entering the U.S. four or five fiscal years prior) should not be understood as predictions of future outcomes for the most recently-arrived cohort. A second limitation of the data for its purpose is that it does not enable a direct assessment of the role or impact of ORR resettlement services in the observed outcomes. These limitations are clearly stated in the text and technical appendix of the Annual Report to Congress, and in the technical documentation for the public-use data file.

Table A2 presents information describing the data collection activities involved in this ICR. As noted above. The introduction letter and postcard have been revised to reflect a slightly increased time estimate for the ASR (from 48 to 50 minutes).

Table A2. Data Collection Activities for the Annual Survey of Refugees

<i>Data Collection Activity</i>	<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Introduction Letter and Postcard (2023 Proposed)	1	<p>Respondents: All sampled Principal Applicants</p> <p>Purpose: Notice of selection into study sample; option to update contact information</p>	<p>Mode: Introductory paper letter, optional update of contact information via pre-stamped postcard or phone</p> <p>Duration: 3 minutes</p>
ORR-9 Annual Survey of Refugees (2023 Proposed)	2	<p>Respondents: Refugee Principal Applicants, on behalf of the household and family members aged 16+.</p> <p>Content: Household roster, detailed demographic information for eligible individuals aged 16+, household-level measures</p> <p>Purpose: The ASR generates national</p>	<p>Mode: Computer Assisted Telephone Interviewing</p> <p>Duration: Varies by household roster size; average time to complete for a household is 50 minutes.</p>

		population estimates of refugee labor force participation, public benefits receipt, English language acquisition, and conversion to legal permanent residency to meet ORR's Congressional reporting requirements.	
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Other Data Sources and Uses of Information

To meet ORR's congressional reporting requirements, descriptive information from the ASR is presented alongside other quantitative and qualitative information generated by ORR's grantee performance reporting and compliance monitoring.

3. Use of Improved Information Technology and Burden Reduction

The Annual Survey of Refugees is administered using Computer Assisted Telephone Interviewing (CATI), to minimize errors, ensure administrative efficiency, and reduce respondent burden.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected through the ASR is not otherwise available in a consistent manner from ORR grantees or the States. Though ORR receives data from many sources on refugee populations present in the U.S., there are no available data on refugees' economic adjustment after arrival in the U.S over the five-year period after arrival. Per statute, ORR is specifically charged with collecting such data.

During a multi-year ASR redesign process (redesigned survey implemented in 2020), ORR assessed the feasibility of compiling administrative data to meet ORR's Congressional reporting requirements, particularly for estimates of public benefits receipt. The conclusion was that limits to legal authority and the logistical challenges of collecting information about multiple benefits programs from each of the fifty states would be prohibitive.

For the current updates, the ASR instrument was revised in coordination with other ORR data collection and reporting activities, to avoid duplicative efforts. For example, the revised 2023 instrument incorporates questions that were developed for the Operation Allies Welcome (OAW) Survey of Resettled Afghans (OMB # 0970-0531) conducted in June 2022 to expand data collection to other refugee populations to strengthen this nationally representative data on refugee well-being, integration outcomes and progress towards self-sufficiency. The revised questionnaire will ensure additional topical areas reflect refugees' specific needs and challenges during different resettlement phases.

5. Impact on Small Businesses or Other Small Entities

This data collection is a survey of households and does not have an impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

The survey is conducted annually to meet ORR's statutory reporting requirements, as laid out in 8 U.S.C. 1523.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

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 activity. This notice was published on June 1, 2023, Volume 88, Number 105, page 35880-35881, and provided a sixty-day period for public comment. During the notice and comment period, one comment was received.

The comment received from Church World Service (CWS) requested that ORR publish the ASR data sooner and to include CWS in the development of future questionnaires. As described in A10 below, ASR data are available in tabulations published in ORR's Annual Report to Congress and via public-use data files that are archived for access by external researchers through ICPSR at The University of Michigan. The timing of the Annual Report to Congress determines the availability of the ASR data tabulations published in this report. ORR is currently exploring mechanisms to make the public-use data files available sooner.

Consultation with Experts Outside of the Study

The ASR instrument incorporates feedback from the expert consultations conducted for the OAW Afghan Supplement Survey (OMB # 0970-0531). This survey design process involved consultation with stakeholders (such as service providers), OAW Afghan arrival representatives, and Afghan cultural experts to collect input about key question categories of interest, the survey questionnaire, and survey implementation to ensure the survey is linguistically and culturally appropriate and trauma-informed. Persons consulted outside the agency include:

- Mohammed Naeem: Senior Manager for Strategy and Partnerships at the Center for Inclusion and Belonging in the American Immigration Council.
- Salah Ansary: District Director of Refugee Resettlement at Lutheran Community Services Northwest

- Farhad Sharifi: OAW Afghan arrival, Refugee Program Advisor, Research Program on Children and Adversity at the Boston College School of Social Work
- Dr. Rosalind Rogers: Afghan American psychologist, Consultant for Mental Health Program, Operation Allies Welcome
- Staff from the Services Navigator from the Coalition for Humane Immigrant Rights
- Staff from the Women for Afghan Women

Additionally, ORR redesigned the ASR instrument using a multi-year process, beginning in fall of 2016, which resulted in the current ASR questionnaire (OMB# 0970-0033). The ASR redesign process involved stakeholder outreach and an expert roundtable designed to collect input about improvements to the survey that would increase the utility of this information collection for research and evidence building. The instrument revisions were field tested in Fall 2017 and Winter 2018 (approved under the ACF Generic Clearance for Pre-Testing, OMB #: 0970-0355). This involved cognitive interviews with 47 refugees to enhance clarity of the instructions and minimize respondent burden. Further cognitive testing and revision of a limited number of items was conducted with 8 respondents (not subject to PRA) in early 2020. The ASR questionnaire incorporates insights from this effort.

9. Explanation of Any Payment or Gift to Respondents

Please see Supporting Statement B, Section B3 for an overview of the ASR study design features intended to maximize response rate and minimize non-response bias. As one part of an overall design to secure quality data, and to provide continuity with this survey program, the research team proposes to continue to provide a token of appreciation to respondents to the ASR.

In previous survey administrations, the ASR has offered a \$25 token of appreciation to refugees completing the ASR survey on behalf of their household. In 2020, With a goal of increasing the salience of the introductory letter and inducing more voluntary telephone number updates, the study team added a \$2 token of appreciation, which was included in the introductory letter.

As part of the current update, the study team proposes to offer respondents a \$40 token of appreciation upon completion of the survey, which is expected to take about 50 minutes (a slight increase from the previous year's administrations). Additionally, the team proposes to continue to include a \$2 token of appreciation in the introductory letter, to induce more voluntary telephone number updates to participant's contact information.

Providing the \$2 token of appreciation in advance of the survey is supported by related research on the provision of monetary tokens of appreciation¹. The token of appreciation will accomplish two goals: 1) encourage more voluntary telephone updates; and 2) familiarize sample members

¹ Mercer, A., Caporaso, A., Cantor, D., & Townsend, R. (2015). How Much Gets You How Much? Monetary Incentives and Response Rates in Household Surveys. *Public Opinion Quarterly*, 79(1), 105–129. <https://doi.org/10.1093/poq/nfu059>

with the information collection. Both are important to the goal of obtaining data that has maximum utility to inform the U.S. government on the overall well-being and integration outcomes of this population. Using this \$2 token of appreciation structure, the ASR has demonstrated high level of respondent participation conditional on successful contact (74-75%) and no substantial non-response bias on observable demographic characteristics, conditional on successful contact. The response rate has improved for both the 2021 and 2022 ASRs.

Research has shown the efficacy of monetary tokens of appreciation in increasing survey responses rates.² Promised tokens of appreciation in the form of cash or gift cards appear beneficial, improving response rates by 7 and 20 percentage points.³ Moreover, using tokens of appreciation can also lower the cost per completed survey by improving response rates or reducing the need for follow-up contact.⁴ Post-participation tokens of appreciation (\$40) will be used to increase participation. This amount is based on similar tokens of appreciation used in the U.S. Census Bureau's Survey of Income and Program Participation (SIPP) experiment designed to test the effect of monetary tokens of appreciation on overall response rates.⁵ SIPP (OMB#0607-1000) is a nationally representative longitudinal survey that collects household data and measures change on topics similar to those measured in the ASR (e.g., employment, health, well-being, education, etc.). The experiment randomly assigned households to \$0, \$20, or \$40 conditional amounts provided to a household taking the 50 minute interview and found that both the \$20 and \$40 conditional amounts significantly increase overall response rate compared to the control, with the \$40 amount significantly increasing response rate compared to \$20.

10. Assurance of Confidentiality Provided to Respondents

Personally Identifiable Information

The Refugee Arrivals Data System (RADS), from which data are extracted for the purposes of

² Knoll, M., Soller, L., Ben-Shoshan, M., Harrington, D., Fragapane, J., Joseph, L., La Vieille, S., St-Pierre, Y., Wilson, K., Elliott, S., & Clarke, A. (2012). The use of incentives in vulnerable populations for a telephone survey: a randomized controlled trial. *BMC research notes*, 5, 572. <https://doi.org/10.1186/1756-0500-5-572>.

³ See Fredrickson, D. D., Jones, T. L., Molgaard, C. A., Carman, C. G., Schukman, J., Dismuke, S. E., & Ablah, E. (2005). Optimal design features for surveying low-income populations. *Journal of health care for the poor and underserved*, 16(4), 677–690. <https://doi.org/10.1353/hpu.2005.0096>; Mercer, A., Caporaso, A., Cantor, D., & Townsend, R. (2015). How Much Gets You How Much? Monetary Incentives and Response Rates in Household Surveys. *Public Opinion Quarterly*, 79(1), 105–129. <https://doi.org/10.1093/poq/nfu059>.

⁴ See Beebe, T. J., Davern, M. E., McAlpine, D. D., Call, K. T., & Rockwood, T. H. (2005). Increasing response rates in a survey of Medicaid enrollees: the effect of a prepaid monetary incentive and mixed modes (mail and telephone). *Medical care*, 43(4), 411–414. <https://doi.org/10.1097/01.mlr.0000156858.81146.0e>; Dykema, J., Stevenson, J., Kniss, C., Kvale, K., González, K., & Cautley, E. (2012). Use of monetary and nonmonetary incentives to increase response rates among African Americans in the Wisconsin Pregnancy Risk Assessment Monitoring System. *Maternal and child health journal*, 16(4), 785–791. <https://doi.org/10.1007/s10995-011-0780-2>

⁵ Westra, A., Sundukchi, M., & Mattingly, T. (2015). Designing a Multipurpose Longitudinal Incentives Experiment for the Survey of Income and Program Participation. Proceedings of the 2015 Federal Committee on Statistical Methodology (FCSM) Research Conference

developing a survey sample and producing statistical weights, is a Privacy Act System of Records (System of Records Number # 09-80-0325, published 02/8/2022). This information collection requires the transfer of personally identifiable information (PII) from RADS to the ASR contractor.

This information collection gathers voluntary updated contact information by sending an Introduction Letter and Postcard (Instrument 1). Contact information is also updated using the National Change of Address service and batch record matching using TransUnion. Contact information from RADS and these additional sources are used for the purposes of administering the survey. This PII is stored separately from the file of survey responses to protect respondent privacy.

The ASR 2023 (Instrument 2) collects the first name and birth date of each individual living in the household. This information is used for the purpose of identifying household members that are eligible for the survey and administering the household roster. It is stored separately from other survey responses to protect respondent privacy.

PII (from RADS, the voluntary contact update, or the survey instrument) is not returned to ACF, either on the restricted-use data file or as a separate data file, as a part of the contract.

Information from the ASR is not maintained in a paper or electronic system from which survey data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

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. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information.

Data Security and Monitoring

The contractor's security plan shall comply with the NIST SP 800-18, Guide for Developing Security Plans for Federal Information Systems; FIPS 199, Standards for Security Categorization of Federal Information and Information Systems; the Federal Information Processing Standard (FIPS) 200, Recommended Security Controls for Federal Information Systems; the latest version of NIST SP 800-53, Security and Privacy Controls for Federal Information Systems and Organizations applicable baseline requirements; and other applicable NIST guidance as well as HHS and ACF policies and other guidance. The data security plan must specify the following:

- The personal or sensitive information that is collected, including content of interviews, notes for tracking purposes, personally identifiable information, and relevant administrative data that will be accessed.

- The assurances provided to respondents or participants about the privacy of their information.
- How data will be entered and stored, including confirmation data security that includes encryption procedures that meet the HHS standards.
- How potentially sensitive information is transmitted, the personal information included in transmissions, any encryption for electronic transmission, the protections in place for materials handled via mail services, etc. This should include discussions of data among staff within the facility as well as between facility staff and field staff.
- The personal information field staff maintain on cases that are in the field, and how field or relevant program staff are instructed to handle and store case folders on which they are working.
- The training procedures in place for all project staff at all levels of the project and specific instructions to all staff related to handling personal or sensitive information.
- The disposition of the data and information collected at the end of the contract.

As part of the detailed data security plan, the Contractor describes their processes for reporting suspected or confirmed breaches of data security protocol to ACF. All data security breaches, including suspected breaches and breaches of protocol **MUST** be reported to ACF no later than one hour after the Contractor's staff is made aware of the breach or the possibility of a breach. The Contractor submits an annual report that outlines their compliance with the data security plan developed for the project, no later than one month after the year has ended.

Data Availability

Data are available in tabulations published in ORR's Annual Report to Congress.

A restricted-use data file and technical documentation are returned to ACF to enable statistical analyses of the survey data. This file does not contain personal identifiers and birth date is reduced to birth year to protect respondent privacy.

Public-use data files and technical documentation necessary for their use are archived for access by external researchers through ICPSR at The University of Michigan. The goal of this effort is to maximize the files' utility for research purposes while protecting the privacy of responding households. Information in the public use file undergoes formal disclosure review by the contractor prior to release to reduce the risk of re-identification, according to standards for de-identification and access control set by ICPSR. The results of the disclosure review process are presented to, and approved by, the federal project officer prior to submission of public use data to the archive.

11. Justification for Sensitive Questions

The ASR collects self-reported information about receipt of economic assistance from the government and application for legal permanent resident status. ORR is required to collect this

information by 8 U.S.C. 1523. Respondents are informed that the provision of this information is voluntary, and that information will be kept private, and that information will only be used for statistical purposes.

This information collection is overseen by the Institutional Review Board of the ASR prime contractor. IRB approval for the study is updated annually, and the ASR primary contractor's IRB package will detail precautions against the inadvertent release and identifiability of sensitive information.

12. Estimates of Annualized Burden Hours and Costs

Explanation of Burden Estimates

This request covers the following administrations of the ASR:

- ASR 2023 – to be fielded spring 2024
- ASR 2024 – to be fielded spring 2025
- ASR 2025 – to be fielded spring 2026

The ASR has an annual target of 1,500 respondents. To ensure sufficient statistical power, the survey stays in the field until this target is achieved.

The ASR asks sampled individuals to provide demographic information about each eligible individual in the household (entering during the survey's reference period and currently aged 16 or older); asks additional questions about their own experiences and perceptions; and collects information about the household as a whole. As such, the burden to the respondent varies by the number of eligible adults in the household. Consistent with previous years, we have estimated response time based on a household averaging 2 eligible adults. Based on administration of the ASR in previous years, and taking into account updates proposed to the ASR, we estimate the average time to complete the revised ASR to be about 50 minutes. This is an increase from the previously approved ASRs, which averaged about 48 minutes. The contact update form is estimated to average about 3 minutes per response, which remains consistent with the current approval.

Information Collection Title	Total Number of Respondents (over three years)	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Introduction Letter and Postcard	4,500	1	.05	225	75	\$32.28	\$2,421
ORR-9 Annual Survey of Refugees	4,500	1	.83	3,735	1,245	\$32.28	\$40,189
Estimated Annual Burden Total:					1,320	Estimated	\$42,610

		Annual Cost Total:	
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Estimated Annualized Cost to Respondents

The cost to respondents for the ASR 2023, 2024, and 2025 was calculated using the estimated average hourly wage of refugees derived from respondents to the 2021 Annual Survey of Refugees, which is \$16.14. To account for fringe benefits and overhead, the rate is multiplied by two, which is \$32.28.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs to respondents.

14. Annualized Cost to the Federal Government

Table A4 is presented for the proposed revision to the ICR, and applies to ASR 2023, 2024, and 2025.

Table A4. Cost for ASR 2023, 2024, 2025

Cost Category	Estimated Costs
Project Management and Communication (3 Annual)	\$440,000
Data Security and Storage (3 Annual)	\$100,000
Survey Administration (3 Annual)	\$2,100,000
Data Preparation, Analysis, and Documentation (3 Annual)	\$555,000
Data Archiving (3 Annual)	\$280,000
Total costs over the request period	\$3,475,000
Annual costs	\$1,158,333

15. Explanation for Program Changes or Adjustments

The burden associated with the ASR was increased from 48 to 50 minutes, to reflect estimates of the burden from the revised instrument for a household averaging 2 eligible adults. This marginal increase in individual burden is expected to substantially increase the utility of the data collection for ORR programmatic use and secondary research use to improve understanding of the factors associated with resettlement outcomes.

16. Plans for Tabulation and Publication and Project Time Schedule

The ASR is fielded yearly in the calendar Spring and tabulated by the contractor soon after. Tabulations are published in ORR's Annual Report to Congress.

Following the publication of the Annual Report to Congress, the public use data file and documentation will be archived on the website of ICPSR at University of Michigan, to enable secondary research use of the data.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

No request is submitted to seek approval to not display the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

Attachments

Attachment A – Overview of changes proposed to the ASR

Instrument 1 – Introduction Letter and Postcard (2023 Proposed)

Instrument 2 – ORR-9 Annual Survey of Refugees (2023 Clean)