Voluntary Agencies Matching Grant Program Data Reporting

OMB Information Collection Request
0970 - NEW

Supporting Statement Part A – Justification

Type of Request: New

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Submitted By:
Office of Refugee Resettlement
Administration for Children and Families

1. Circumstances Making the Collection of Information Necessary

The Voluntary Agencies Matching Grant Program Data Reporting is designed to satisfy the statutory requirements of the Immigration and Nationality Act (INA). Section 412(a)(3) of the INA (8 U.S.C. § 1522(a)(3)) requires that the Director of the Office of Refugee Resettlement (ORR) make a periodic assessment of the needs of refugees for assistance and services and the resources available to meet those needs. In addition, Section 412(a)(7) of the INA (8 U.S.C. § 1522(a)(7)) requires ORR to develop a system to monitor the assistance provided under the Refugee Act that includes evaluation of the effectiveness of the program and data collection on the services provided and the results achieved. To satisfy these statutory requirements, ORR requires resettlement agencies participating in the Matching Grant program to annually submit records containing certain data elements for eligible clients participating in the program. ORR uses the data currently collected to assess the number of clients served and client outcomes. The data collected informs evidence-based policy making and program design.

Matching Grant Program funding is open only to national resettlement agencies that provide initial Reception and Placement services through a cooperative agreement with the Department of State's Bureau of Population, Refugees, and Migration. Currently, the nine resettlement agencies participating in the Matching Grant Program submit data on client enrollments and outcomes to ORR per award guidelines. With the recent addition of a tenth resettlement agency and its expected participation in the Matching Grant Program in FY 2024, ORR is seeking OMB approval of its Matching Grant Program data collection tools based on the requirements of the Paperwork Reduction Act (PRA). Feedback from stakeholders on the current collection methods have informed this new, proposed collection. Changes include enhancements to client-level data that provide greater demographic detail and support equity among program participants.

2. Purpose and Use of the Information Collection

Through this request, ORR proposes to collect both case-level and client-level data elements at multiple points in time, which will allow the ORR Director to better understand client demographics, services utilized, and the outcomes achieved by clients enrolled in the Matching Grant Program.

Data elements include biographical information, progress made toward achieving self-sufficiency, and employment status. Data elements also include information on housing, connections to other services and benefits, and receipt of identity and employment documentation. Collecting this type of information will allow the ORR Director to better understand client profiles and the outcomes achieved by the populations ORR serves. This deeper understanding of a client's progress in reaching self-sufficiency will better inform programmatic and policy decision making and ultimately improve programs and services for the populations ORR serves. It will also help more clearly identify barriers to self-sufficiency. ORR intends to use the proposed new information to identify trends and gaps in services and will consider expanding targeted programming or engage other federal agencies to address identified barriers or gaps.

It is important that ORR have a better understanding of client needs and how services are being utilized. To do this, it is important that ORR approach this in a consistent manner across resettlement agencies, as aggregate and non-standardized reporting limits the ability to fully understand the data and outcomes.

Below are examples of questions the proposed Matching Grant data could help ORR address to strengthen data-informed programmatic and policy decision making:

- If and how does gender impact employment status?
- If and how does location relate to employment status or wage?
- Do employment and self-sufficiency outcomes vary based on immigration status?
- To what degree do delays in receipt of documentation impact employment and self-sufficiency?

Addressing these questions will also be of benefit to resettlement agencies as they make administrative decisions on how to develop service design.

Aggregate level data and anecdotal reports collected provide limited insight into the relationships between individual, family, and site-specific needs. Individual level data collection enhances ORR and resettlement agencies' ability to make data-informed programmatic and policy decisions to strengthen services and best support populations served on their path to self-sufficiency and integration.

Regular reporting also enables ORR to better assess resettlement agency performance. Annual Matching Grant Program grant amounts are established by the ORR Director based on one or more of the following factors: availability of Federal funding and each grantee's anticipated percentage of newly arrived ORR eligible populations, past Matching Grant Program performance, agreement with ACF's General Terms and Conditions, and the Matching Grant Program Guidelines. ORR will continue to assess resettlement agency performance by analyzing enrollment and outcome data submitted via RADS, and such performance may influence program funding decisions.

3. Use of Improved Information Technology and Burden Reduction

This information collection uses improved information technology. In the past, resettlement agencies submitted data via email. Resettlement agencies are now required to submit data through the ORR data collection website system, the Refugee Arrivals Data System (RADS). The data submission website permits resettlement agencies to upload data files, allows ORR to verify receipt of the data and perform front-end verification to immediately reject invalid data while providing an explanation for the rejection, and enables resettlement agencies to resubmit corrected files. The system also allows for data correction online after the initial data is loaded. This process ensures that resettlement agencies' final data submissions are complete and correctly formatted to maximize probability of accurate data matching. Additionally, moving forward, RADS will allow resettlement agencies to export data records and run data quality reports. The system maximizes accuracy, ensures administrative efficiency, and reduces burden on resettlement agencies.

4. Efforts to Identify Duplication and Use of Similar Information

The data proposed to be collected in the Matching Grant Program Data Reporting has minimal duplication in regard to data collection efforts by other agencies. ORR receives limited demographic and individual level information from the Department of State (DOS) on refugee arrivals, such as nationality and location. ORR receives demographic individual information from the Department of Homeland Security (DHS), such as Alien Number, full name, date of birth, and occasionally, city and state for Cuban/Haitian Entrants and asylees. Additionally, DOS collects outcome information for refugee populations served under the DOS-funded Reception and Placement (R&P) program; however, that information is not shared with ORR, and it is limited to the first 90 days of R&P service for eligible arrivals.

Unlike DOS or DHS, the Matching Grant Program Data Reporting collects individual information on all populations served by ORR, including refugees, entrants, asylees, special immigrant visa holders, victims of trafficking, and certain parolees. The proposed Matching Grant Program Data Reporting intends to collect information beyond demographics, to include service information and outcomes for programs funded by ORR. While there is a slight overlap in terms of individually identifying information, the Matching Grant Program Data Reporting collects more specific information on ORR-funded services and outcomes, that is not collected by, or under the purview of, other federal partners. ORR does not intend to share personal identifiable information (PII) collected through the Matching Grant Program Data Reporting with other agencies.

The proposed Matching Grant Program Data Reporting information collection was compared with other ORR reports currently used to ensure that it is not redundant. ORR believes that similar information currently available cannot be used as a sole resource, nor is it sufficient to meet the statutory requirements described in section 1 above. The Matching Grant Program Data Reporting is the only source of client and outcome data for the program.

5. Impact on Small Businesses or Other Small Entities

ORR does not anticipate any impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

As outlined in the Data Reporting Form and Instruction, the proposed Matching Grant Program Data Reporting has three parts: a Client Information Form, A Matching Grant Enrollment Form, and a Matching Grant Status Form. ORR proposes that resettlement agencies upload the Client Information and Enrollment Forms after the close of each month for all clients enrolled into the program during that month. Resettlement agencies would upload the Status Form twice annually, at the middle and the end of the program year.

This information will be collected to meet ORR's statutory requirements, as described in Sections 412(a)(3) and 412(a)(7) of the INA (8 U.S.C. §§ 1522(a)(3) and (7)). Information collected in the Matching Grant Program Data Reporting will guide program design and implementation as well as resource allocation. If the collection is not conducted or is conducted less frequently, ORR will be unable to accurately assess the needs of clients and resettlement agencies in a timely manner. More information on collection frequency is provide below in Section 7.

7. Special Circumstances Relating to the Guidelines of 5 C.F.R. § 1320.5

Per the guidelines of 5 C.F.R. § 1320.5, ORR must demonstrate, in its submission for OMB clearance, that any collection of information requiring reporting more often than quarterly is necessary to satisfy statutory requirements or other substantial need. ORR believes that requiring monthly reporting of certain Matching Grant data is necessary and justified, as described in Section 6 above. Section 412(a)(3) of the INA (8 U.S.C. § 1522(a)(3)) requires that the ORR Director "make a periodic assessment, based on refugee population and other relevant factors, of the relative needs of refugees for assistance and services under this subchapter and the resources available to meet such needs. …In allocating resources, the Director shall avoid duplication of services and provide for maximum coordination between agencies providing related services."

Monthly reporting of client information and enrollments is needed to provide timely and accurate program data to the ORR Director. Resettlement agencies are collecting and recording this information

already in order to manage their programs. ORR is asking agencies to upload such information to RADS after each program month. Having up-to-date enrollment data is necessary to track the pace of enrollments and proactively adjust funding allocations if needed. Real-time forecasting is critical to resource allocation decisions. Under the PRA, after the addition of a tenth resettlement agency ORR would no longer be able to request any ad-hoc enrollment reports outside of the approved reporting windows, preventing ORR from making timely evidence-based funding decisions. Quarterly uploads would not be frequent enough to enable such real-time decision-making.

Monthly uploads will also reduce the likelihood of dual enrollments and duplicative services. Clients may approach more than one agency for Matching Grant services or move to a new location after enrolling in the program. If a client is enrolled in Matching Grant in more than one resettlement agency site, this can be caught quickly in RADS. With less frequent uploads, it is more likely that clients could be enrolled at multiple sites for an extended period.

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 the Office of Management and Budget (OMB) regulations at 5 C.F.R. Part 1320 (60 FR 44978, August 29, 1995), the Administration for Children and Families 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 July 19, 2023 (88 FR 46169) and provided a sixty-day period for public comment. During the notice and comment period, three sets of public comments were received from two resettlement agencies.

ORR held a Questions and Answers (Q&A) session with resettlement agencies on August 18th, 2023, to address any clarifying questions regarding this proposed collection. ORR advised in the meeting invitation that the Q&A session would allow time for technical or other clarifying questions but was not intended to solicit feedback, as feedback should be directed to the mailbox in the Federal Register notice. Resettlement agency representatives asked several clarifying questions, largely around the implementation timeline, database updates and the mechanics of reporting, and the reporting schedule, which were fielded by Matching Grant Program staff within ORR and RADS representatives.

ORR developed this data collection based on many years of working closely with the resettlement agencies currently participating in the Matching Grant Program. Input from resettlement agencies was incorporated into the approach and design of the reporting system.

Please see Appendix A for detailed responses to all public comments received.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts for respondents are proposed for this information collection.

10. Assurance of Confidentiality Provided to Respondents

The Matching Grant Program Data Reporting collects PII. Resettlement agencies are required to submit Matching Grant data through the RADS website. RADS is a Privacy Act System of Records (System of Records Number #09-80-0325, published on February 8, 2022, Vol. 87, No. 26) and the secure location where Matching Grant data is stored. ORR will issue a Privacy Act Statement with the legal authority of the Matching Grant data collection, purpose, routine uses, and disclosures to states. Resettlement

agencies will be required to ensure that the Privacy Act Statement is communicated to the individuals from whom they are collecting data. Individual information collected will be kept private to the extent permitted by law. ORR currently uses aggregate data to inform its Annual Report to Congress.

11. Justification for Sensitive Questions

The Matching Grant Program Data Reporting collects information about immigration status and receipt of certain financial assistance from the government. ORR is required to collect information about immigration status to determine eligibility for ORR services. Collecting information on the services provided, and the need for those services, is required by the INA, section 412(a)(7)(C). Individuals from whom the information is requested will be informed of the purpose and usage of the collected information. Individuals will be assured that the information collected will be kept private to the extent permitted by law.

12. Estimates of Annualized Burden Hours and Costs

The cost to respondents was calculated using the U.S. Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2022,[1] which is $38.18 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, totaling $76.36.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent (3 years)	Average Burden Hours Per Response	Total Burden Hours (3 years)	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Voluntary Agencies Matching Grant Program Data Reporting–Data System Updates	10	1	60	600	200	$76.36	$15,272
Voluntary Agencies Matching Grant Program Data Reporting–Monthly Uploads	10	36	16	5,760	1,920	$76.36	$146,611
Estimated Annual Burden Total:					**2,120**	**Estimated Annual Cost Total:**	**$161,883**

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

There are no start-up costs to respondents and record keepers, as resettlement agencies already have databases for the purposes of collecting and maintaining Matching Grant Program records.

[1] U.S. Bureau of Labor Statistics, *Occupational Employment and Wages, May 2022, 11-9151 Social and Community Service Managers*, https://www.bls.gov/oes/current/oes119151.htm.

Costs for operation and maintenance and purchase of services components was estimated based on costs reported by resettlement agencies in their Matching Grant Program budgets submitted to ORR. Such costs include, among other items, software licensing, user fees, continual system improvements and adjustments, system upgrades, and consultant fees, and cloud storage, ranging from $5,096 to $150,000 annually.

14. Annualized Cost to the Federal Government

Annualized cost to the federal government consists of both federal employee labor and the cost of contractor services throughout the life cycle of the Matching Grant collection. The table below presents a breakdown of estimated annual cost items for the Matching Grant Program Data Reporting. The annualized cost to the federal government is estimated at $434,102.

An estimated 24 hours of GS-13 employee time will be used on annual information collection oversight and support, data review, and data analysis. The average hourly rate of GS-13 employees is $53.67.[2] ORR has a firm-fixed-price (FFP) contract with a contractor on various ORR program data collection activities. The cost of contractor services spent on the Matching Grant Program Data Reporting is based on the percentage of time the contractor works exclusively on Matching Grant activities. The cost of contract service for the Matching Grant Program Data Reporting is estimated to be $432,814 annually.

Cost Category	Total Estimated Costs
Employee: Overseeing information collection, periodic data review and analysis.	$3,864
Contractor services: IT support; operation and maintenance of the RADS system for the Matching Grant collection; data collection, verification, analysis, and reporting.	$1,298,442
Total costs over the request period	$1,302,306
Annual costs	$434,102

15. Explanation for Program Changes or Adjustments

This is a new information collection.

16. Plans for Tabulation and Publication and Project Time Schedule

Data submitted by resettlement agencies via RADS are compiled and analyzed by the ORR data contractor and ORR program staff for the purpose of assessing client outcomes and resettlement agency performance, as well as enhancing program design. The results of such analysis will not be published.

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

All instruments will display the expiration date for OMB approval.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

[2] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/general-schedule/, accessed on September 25, 2023

Attachments:

1. Voluntary Agencies Matching Grant Program Data Reporting Form
2. Voluntary Agencies Matching Grant Program Data Reporting Instructions
3. Voluntary Agencies Matching Grant Program Data Reporting Instructions Attachment (Acceptable Values)
4. Appendix A: ORR Response to Public Comments on the Voluntary Agencies Matching Grant Program Data Reporting