

**Office of Refugee Resettlement (ORR) Services for
Survivors of Torture (SOT) Program Data Points (PDP)
and Performance Progress Reports (PPR)**

**OMB Information Collection Request
0970 - 0599**

**Supporting Statement Part A -
Justification**

October 2026

Type of Request: Reinstatement without Change

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

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) Office of Refugee Resettlement (ORR) intends to continue collecting demographic, programmatic, and outcome data on Services for Survivors of Torture (SOT) grant recipients and the clients they serve. ORR received OMB approval for a revised Program Data Points (PDP) Form and Performance Progress Report (PPR) in April 2026. These revisions aim to reduce the burden of reporting by only collecting information necessary for program oversight and to measure effectiveness.

However, we are now requesting reinstatement without change of the previously OMB-approved PDP Form for one year to give the Refugee Arrivals Database Systems (RADS) technical support staff more time to update the SOT Module. ORR plans to move forward with the OMB-approved PPR since it is collected through a different system.

The information collection is authorized under Section 5(a) of the "Torture Victims Relief Act of 1998," Pub. L. 105-320 (22 U.S.C. § 2152 note) Assistance for Treatment of Torture Victims.

2. Purpose and Use of the Information Collection

Grant recipients submit aggregated data on new and continuing clients annually, including demographic information, characteristics related to experiences of torture, services received, and well-being across seven outcome domains. Grant recipients also provide information about community attendance at trainings and pro-bono services donated to the program. This data collection allows ORR to learn more about the populations served by SOT grant recipients; the types and effectiveness of services provided; methods, challenges, and facilitators of implementing services; and grant recipients' progress towards programmatic goals. The data collected also informs technical assistance activities for grant recipients. A summary of the information collected is and will continue to be used by ORR in reports to stakeholders, including a required report to Congress, and in support of funding requests.

3. Use of Improved Information Technology and Burden Reduction

PDPs: Data entry for PDPs takes place in the ORR RADS, an information technology platform used for enhanced data collection and record keeping. To facilitate data entry, ORR provides an optional tracking spreadsheet where grant recipients can enter individual client information and produce an aggregated report to enter into RADS.

PPRs: PPRs are primarily narrative reports on grant recipients' progress towards their goals and are formatted as Word documents or PDFs. Grant recipients submit PPRs to ORR by uploading their files to GrantSolutions, an internet portal.

4. Efforts to Identify Duplication and Use of Similar Information

This is a data collection for the cohort of SOT grant recipients. ORR is the funding agency for the SOT program and as such is the only agency collecting program-specific information of this kind from the grant recipients.

5. Impact on Small Businesses or Other Small Entities

Respondents are recipients of an SOT Program grant and may include some small entities as grant recipients are comprised of non-profit social service, health, and higher education organizations, states, municipalities, and for-profit organizations. ORR has to reduce . burden on grant recipients, as described in A12.

6. Consequences of Collecting Information Less Frequently

SOT grant recipients receive five-year awards, and PDP reporting occurs at the end of each fiscal year while PPR reporting occurs at mid-year and at the end of each fiscal year, with the exception of the PPR-B Program Metrics which is collected annually. Not collecting this information or collecting this information less frequently would compromise ORR's ability to assess the performance of the SOT program, track how grant recipients are using government funds, the demographic information of the clients, and the outputs and outcomes of the program.

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

The special circumstances listed under 5 CFR 1320.5 are not applicable to this collection of information

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

N/A

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be provided to respondents. Completing this collection of information is a condition of the SOT grant award.

10. Assurance of Confidentiality Provided to Respondents

No assurance of confidentiality is provided, but ORR makes best efforts to maintain the privacy of all records. This information collection does not include client-level identifiable information but grant recipients and some grantee staff may be named.

11. Justification for Sensitive Questions

The PDPs include aggregated responses to sensitive questions relating to the nature of the torture clients experienced and the reasons they were targeted for torture. The majority of this is information that recipients already collect from clients as part of their client intake process; as such, the information is not collected solely for the PDPs. SOT recipients report aggregate program data and do not include individual client data.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

The reinstatement of the expired PDP Form would change the reduction in burden hours from 30% to 20%. This calculation is based on the estimated reporting burden for the revised PPR along with the reinstated PDP Form. Overall, these changes will reduce the estimated reporting burden from an average of six hours per response to an average of 4.2 hours per response.

Burden for the PDPs was calculated by estimating the length of time it would take the respondent to review instructions, collate the information needed to respond to the 19 Program Indicators and 7 Outcome Indicators on the form, and enter the data into the RADS database. Burden for the PPRs was calculated by estimating the length of time it would take the respondent to review instructions, complete the data elements (1 through 9), sign the PPR Cover Page, collate information, and provide performance narratives for the three Program Assessment Areas.

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Estimated Annual Cost
Program Data Points Form (PDPs) – FY 2026	35	1	6	210	-	\$85.46	\$-
Program Data Points Form (PDPs) – FY 2027 & 2028	35	2	4.2	294	-	\$85.46	\$-
Average Burden for PDP	35	3	4.8	504	168	\$85.46	\$14,357
Performance Progress Reports (PPRs) – Parts A and B	35	2	4.2	882	294	\$85.46	\$25,125

Estimated Burden Total:	1386	462	Estimated Annual Cost Total:	\$39,482
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Estimated Cost to Respondents

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2025, which is \$42.73 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$85.46. The estimate of annualized cost to respondents for one burden hour is \$85.46 times 504 hours or \$43,072. <https://data.bls.gov/oes/#/home>

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

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

Information Collection Title	Total Number of Federal Employees	Average Number of Hours Per Staff	Average Total Number of Hours	Average Hourly Wage	Total Annual Cost
Program Data Points Form (PDPs)	2	20	40	\$125.34	\$5,014
Performance Progress Reports (PPRs) – Parts A and B	2	18	36	\$125.34	\$4,512
Estimated Annual Hours Total:			76	Estimated Annual Cost Total:	\$9,526

The cost to the Federal Government was calculated using the average hourly rate for General Schedule 12 and General Schedule 13, Step 5 positions which is \$62.67 per the Office of Personnel Management (OPM) 2026 General Schedule Locality Pay Tables for Washington-Baltimore-Arlington, DC-MD-VA-WV-PA. To account for fringe benefits and overhead the rate was multiplied by two which is \$125.34. The estimate of annualized cost to the Federal Government is \$125.34 times 76 hours or \$9,526.

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2026/general-schedule/>

15. Explanation for Program Changes or Adjustments

This request is to extend an existing data collection system with minor changes, removing a few subcategories for program indicators, and reducing the amount of information reported in the PPR-B Metrics to minimize the burden on respondents. See section A12 for additional information.

16. Plans for Tabulation and Publication and Project Time Schedule

No complex analyses are planned for this data. ORR will produce summary information describing the PDP data on an annual basis to share with Congress for appropriation requests and annual reports and with SOT program recipients to share trends in the demographics of clients served and service outcomes.

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

Exemption from displaying OMB expiration date is not being sought.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.