Immigration Legal Services for Afghan Arrivals – Legal Service Provider Interest Form

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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Submitted By:
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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 for an information collection to support the Office of Refugee Resettlement (ORR) to ensure Eligible Afghan Arrivals (EAA) across the country receive quality legal services as part of ORR's Immigration Legal Services for Afghan Arrivals (ILSAA) program.

Background

ILSAA is funded by ORR and implemented by the U.S. Committee for Refugees and Immigrants (USCRI) and ICF. ORR is dedicated to providing new populations with the opportunity to achieve their full potential in the United States. Broadly, ORR's programs provide people in need with critical resources to assist them in becoming integrated members of American society. More specifically, ILSAA provides immigration legal services to EAAs across the country and helps build the capacity of immigration legal service providers. In an effort to support the ORR program and ensure ILSAA is providing appropriate services, this collection will provide ILSAA with information to verify the qualifications of the legal service provider (LSP) to provide program services.

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 *ILSAA LSP Interest Form* is to provide ILSAA with relevant information to determine if LSPs meet the qualifications to provide legal services to EAAs through ILSAA. LSPs interested in joining the ILSAA network would be asked to provide publicly available contact information for their legal practice and a description of their qualifications. ILSAA staff will then review the LSP information to ensure the network includes LSPs that are qualified to provide the necessary services to those served through ILSAA.

In addition to onboarding new LSPs to the ILSAA project, the information collected using the *ILSAA LSP Interest Form* will support program improvement by allowing project staff to monitor the aggregate data to see where LSPs are physically located and where additional recruiting may be necessary to meet the needs of the EAAs in each geographic region.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of workflows related to program implementation and the refinement of program and grantee processes.

Processes for Information Collection

LSPs will complete the *ILSAA LSP Interest Form* online to initiate the ILSAA LSP intake process. ILSAA staff will review the provided information and will follow up with LSPs that appear to qualify provide legal services under ILSAA.

A3. Improved Information Technology to Reduce Burden

The *ILSAA LSP Interest Form* will be completed electronically and includes the key data elements to determine if an LSP is qualified to provide legal services through ILSAA. It is expected to take no more than five minutes to complete.

A4. Efforts to Identify Duplication

No other data collection exists that provides the specific information about LSPs needed for ILSAA to receive information from LSPs interested in joining the ILSAA network.

A5. Involvement of Small Organizations

LSPs completing the *ILSAA LSP Interest Form* will often be acting in their individual capacity as a small organization, or as a member of a small organization such as a law firm. Efforts to minimize burden on the small organizations include providing the form electronically, collecting only necessary information, and flexibility for completing the form at a time convenient for the respondents.

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

No consultations have taken place with experts outside of the project team.

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 including use of data to determine their qualification to provide legal services through ILSAA. Any personally identifiable information (PII) will be removed prior to analysis for aggregation or summary reporting.

PII collected during the LSP intake process includes name, contact information, and details about their practice of law.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

We anticipate about 50 LSPs per year to express interest in participating in the ILSAA network. The Interest Form is estimated to take about five minutes to complete.

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Legal Occupations [23-0000] and wage data from May 2022, which is $59.87 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $119.74.

Source: https://www.bls.gov/oes/current/oes_stru.htm

Instrument	Annual Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ILSAA Legal Service Provider (LSP) Interest Form	50	1	0.08	4	$119.74	$478.96

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The annual cost for the data collection activities under this current request will be $823.

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

Information will be collected on a rolling basis while ILSAA is providing support under contract to ACF. ILSAA and ACF will use information collected for planning purposes and to support improved service provision to EAAs.

Data on the number of LSPs participating in the project will be reported in aggregate by state through internal monthly reports. ILSAA staff will monitor the legal service needs of EAAs by state to determine where additional LSP recruitment is needed.

Aggregate information may also be incorporated into documents that are made public, for example in project specific reports or presentations to relevant federal leadership, staff, and local implementing agencies aligned with contract reporting requirements or when needed to facilitate service provision to EAAs.

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

- Information Collection: Immigration Legal Services for Afghan Arrivals (ILSAA) Legal Service Provider (LSP) Interest Form