Office of Refugee Resettlement (ORR)
Unaccompanied Children Bureau
Policy Evaluation
Focus Groups

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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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 to gather qualitative information through a series of focus groups and surveys with Office of Refugee Resettlement (ORR) Unaccompanied Children (UC) Bureau care provider staff to understand their experiences with the implementation of certain UC Bureau policies and procedures and to gather feedback about how certain policies and policies influence the care providers and those they serve.

Background

The ORR UC Bureau Division of UC Policy addresses both legal mandates and child welfare best practices when updating the UC Policy Guide, UC Manual of Procedures (UC MAP), Field Guidance (FG) and notices that care providers are required to implement. The ORR UC Bureau Policy Evaluation Workgroup evaluates policies and procedures to determine their proper implementation and alignment with the needs of the Bureau and appropriate application of child welfare best practices. Policy evaluation is a method used by the ORR UC Bureau to guide continuous quality improvements.

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 following evaluation methods of qualitative data collection.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

This proposed information collection is to gather qualitative data and feedback from ORR UC Bureau care providers as an evaluation method about certain policies and procedures published in the UC Policy Guide, UC MAP, and FG. Certain updated policies and procedures are based on child welfare best practices with the goal of improving services and outcome for the children in ORR care. The Division of UC Policy plans to use the care provider feedback to gain an understanding of challenges and successes in implementation. The study team will produce an internal white paper based off the analysis of feedback for ORR leadership, Division of UC Policy, and other ORR teams with recommendations for training and technical assistance support to ORR care providers.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531) and is expected to be used in the following ways:

- Obtaining feedback about processes and/or practices to inform ORR UC Bureau Policy Evaluation Workgroup recommendations for policy and/or procedure development.
- Obtaining feedback about processes and/or practices to inform ORR program development and implementation support.

- Planning for the provision of programmatic training and technical assistance (T/TA). ORR will use the information obtained to inform decisions about how it can provide related training and technical assistance to the ORR UC Bureau care provider network, as well as foster peer-to-peer learning and sharing of best practices/implementation.

Processes for Information Collection

ORR UC Bureau Policy Evaluation Workgroup will conduct a series of focus groups over the next calendar year, each focused on a separate policy/procedure. The plan is to use a semi-structured focus group protocol with questions that can be adjusted by filling in the policy and/or procedure being evaluated but using the same questions to conduct focus groups. Each individual will participate in one focus group each for up to three different policy/procedure. ORR anticipates hosting eight one-hour focus groups for each of the three topic areas. Focus groups will be organized by respondent type (two for administrators, two for clinicians, two for case managers, and two for direct care staff).

Each focus group process will include ten care provider programs selected to ensure a diverse representation of the various demographics, capacity sizes, locations, and program types among the care providers. ORR will ask each of the care providers to make key personnel available for the focus groups, including the care provider's:

- Program Director or Assistant Program Director
- Clinician
- Case Manager
- Direct Care Staff Managing the Policy Implementation – possibly Youth Care Worker or Case Aide if not the Clinician or Case Manager as this may vary by care provider.

The focus group questions will be shared ahead of time so participants may be better prepared to answer the questions asked during the focus group. Focus groups will be facilitated remotely with a notetaker present, and not recorded so participants may feel more comfortable responding. Written responses will not be requested nor collected.

A3. Improved Information Technology to Reduce Burden

The focus groups will be conducted virtually using a videocall platform (e.g., Zoom or Microsoft Teams) and an email will be used for communication before and after the sessions.

A4. Efforts to Identify Duplication

The information being collected is not available from other sources.

A5. Involvement of Small Organizations

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Data Collection

This is being requested to occur three times over the course of a year as an evaluation method of three different policies and procedures.

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 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. Personally identifiable information will not be collected.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

The time per response was established by estimating the time needed to read the focus group invitation with instructions (15 min) and attend the focus group session (one hour). Each year, three topics will be covered. For each topic, eight focus groups will be conducted: two for administrators, two for clinicians, two for case managers, and two for direct care staff. Each focus group will have up to ten participants, for a total of 80 participants over the series.

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Other Residential Facilities, Managers (for Administrators), Community and Social Service Occupations 21-0000 for Counselors/Clinicians, and Case Managers, then Social/Human Services Assistants (Youth Care Workers) and wage data from May 2023. To account for fringe benefits and overhead the rate was multiplied by two for each category of staff. 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
Administrators Only - Policy Evaluation Focus Groups Questionnaire Template	20	3	1.25	75	$86.62	$6,496.50
Clinicians and Case Managers Only - Policy Evaluation Focus Groups Questionnaire Template	40	3	1.25	150	$42.72	$6,408.00
Direct Care Staff - Policy Evaluation Focus Groups Questionnaire Template	20	3	1.25	75	37.16	$2,787.00
Totals:	**80**	**3**	**1.25**	**300**		**$15,691.50**

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 $15,005.64.

The total cost estimate considers the time of one step 1 GS-12 and one step 1 GS-14, both in the Washington, DC locality, to 1) arrange and conduct the focus group sessions, and 2) review information obtained during the focus group sessions and example tools/products emailed to ORR. The estimated time allocated for conducting the focus groups is 24 hours, and the time for reviewing the information is 40 hours. No additional costs will be incurred by the Federal government. The hourly rate was multiplied by two to account for fringe benefits and overhead.

Total Number of Federal Staff	Total Burden Hours	Average Hourly Wage	Total Cost
1 (GS-12 Staff)	64	$95.06	$6,083.84
1 (GS-14 Staff)	64	$133.58	$8,921.80
Total Burden and Cost Estimates:			**$15,005.64**

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

Focus groups will be held for three separate policy and procedure evaluations. The purpose includes updates to agency guidance, such as the UC Policy Guide, UC MAP, and FG, in addition to developing recommendations for training and technical assistance support for ORR care providers. Focus groups will begin following OMB approval and are anticipated to take place over a period of about a year. ORR plans to compile an internal white paper based off the analysis for ORR leadership, Division of UC Policy, and other ORR teams.

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

Policy Evaluation Focus Groups Semi-Structured Protocol