Unaccompanied Children Office of the Ombuds Report of a Concern

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A – Justification

August 2024

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

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

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 provide a brief intake form and resource mailbox for individuals who would like to voluntarily raise concerns about the Unaccompanied Children Bureau in the Office of Refugee Resettlement (ORR) to the Unaccompanied Children Office of the Ombuds (UCOO). The form includes fields to collect basic, voluntary information from respondents.

Background

UCOO was established under the Unaccompanied Children Program Foundational Rule which became effective July 1, 2024. The office is independent of ORR and located in the Immediate Office of the Assistant Secretary (IOAS). It provides oversight to the Unaccompanied Children Bureau in ORR for concerns raised by unaccompanied children and stakeholders about ORR's care of unaccompanied children, policies, and/or procedures. Individuals can raise their concern to UCOO by filling out an intake form or sending the office an email. This current request fulfills the first requirement to allow for this process to begin and for ACF to provide support and resources as needed. It will be followed by a more robust form which will go through a full review and approval process.

Legal or Administrative Requirements that Necessitate the Collection

The final rule establishing the UC Office of the Ombuds went into effect on July 1, 2024 and established the impartial office with authority to receive reports, including confidential and informal reports, of concerns regarding the care of unaccompanied children; to investigate such reports; to work collaboratively with ORR to potentially resolve such reports; and issue reports concerning its efforts.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

UCOO has created a brief intake form and resource mailbox so that individuals may voluntarily raise concerns about ORR's Unaccompanied Children Bureau and can provide basic information about their concerns. The individual may provide as much or as little detail as desired. Information will be used to provide appropriate resources and guidance to individuals. The form will also be a starting point for and will inform the development of a more robust form. When the more robust form is created, it will be submitted for review and approval under the Paperwork Reduction Act.
This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Obtaining feedback about processes and/or practices to inform ACF program development or support.

Processes for Information Collection

If an individual wants to raise a concern to UCOO, then they can either fill out an intake form or send the office an email. The office's resource mailbox is UC.Ombuds@acf.hhs.gov.If an individual raises a concern to the office by email, the email address used will be collected. The intake form has fields for the following information:

- email address (optional);
- name (required unless respondent selects to submit anonymously);

- phone number (optional);
- subject (optional);
- a description box for detailed information (no specific information requested; the individual may provide as much or as little detail as desired);
- attachment(s) (optional).

A3. Improved Information Technology to Reduce Burden

Individuals will be able to contact UCOO to raise concerns about the Unaccompanied Children Bureau in ORR by filling out an intake form powered by Zendesk, a customer support software, and/or by sending an email to UCOO's resource mailbox.

A4. Efforts to Identify Duplication

Currently, there is not a formal process in the federal government for individuals to raise any concerns about the Unaccompanied Children Bureau in ORR to a neutral, independent oversight body. Concerns should first be raised to ORR, who may obtain some similar information as a result. However, it is necessary for the Ombuds to have separate reporting mechanisms to maintain independent oversight if concerns cannot be resolved directly by ORR or remain after ORR's response.

A5. Involvement of Small Organizations

No small businesses will be involved with this information.

A6. Consequences of Less Frequent Data Collection

UCOO cannot address individual concerns without these data collection methods. Robust data collection is necessary to provide informed, data-driven recommendations to ORR about the Unaccompanied Children Bureau. Collecting data in the proposed way will allow the office to do this.

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 outside experts, but we intend to engage constituents on the development of a more robust reporting form for use in the future.

A9. Tokens of Appreciation for Respondents

No tokens of appreciation for respondents are proposed for this information collection.

A10. Privacy of Respondents

We will collect personally identifiable information to allow for follow up with the respondent, as needed. 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.

Information will be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

Respondents may voluntarily provide information that may be considered sensitive, but the intake form will not request sensitive information and respondents will not be required to share sensitive information to UCOO's resource mailbox when they raise a concern.

A12. Estimation of Information Collection Burden

Burden Estimates

UCOO will collect information through two mechanisms: an intake form and an email address. The office anticipates about 600 respondents per year, with each respondent providing one response. The office anticipates that this will take each respondent 0.5 hours to complete. Since this is a new effort, the office will monitor respondent numbers and if needed, will update this request to reflect more accurate numbers.

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for 00-0000 and wage data from May 2023, which is $31.48 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $62.96.

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
Intake Form	300	1	.5	150	$62.96	$9,444
Email	300	1	.5	150	$62.96	$9,444
Totals:	**600**	**1**	**.5**	**300**	**$62.96**	**$18,888**

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 $353,487.50.

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

The timeline for data collection efforts will be ongoing, as individuals can raise a concern to UCOO at any time. The information collected may be synthesized and used to inform content for annual reports to Congress, in presentations to other ACF offices, federal agencies, and other relevant entities who may have a legal basis to be privy to UCOO's recommendations.

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

- Unaccompanied Children Office of the Ombuds Report of a Concern Intake Form